

# Laura Bush 21st Century Librarian Program Phase Two Reviewer Handbook

# Office of Library Services Fiscal Year 2024

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# Welcome

Thank you for agreeing to serve as a peer reviewer for this year's Laura Bush 21<sup>st</sup> Century Librarian program. We hope you will find this a rewarding experience and will draw satisfaction identifying projects that will enhance the quality of library and archival services nationwide by advancing theory and practice. We assure you that your contribution of time and expertise will be invaluable to IMLS and to the applicants who will receive your comments.

In this handbook, you will find the information you need to carry out your review, including information about the program, instructions for using eGMS Reach, and important reference material.

If you have any questions about this material or the processes described, please do not hesitate to contact your panel chair at any time.

Once again, thank you for the service you are about to render to libraries and communities throughout the nation.

IMLS Office of Library Services Staff

# **Proposal and Review Process Timeline**

Below is a summary of the process from application proposal submission through award announcements.

#### Phase One

- 1. Applicants submit preliminary proposals to IMLS.
- 2. IMLS checks the preliminary proposals for eligibility and completeness.
- 3. IMLS identifies available reviewers with appropriate expertise and assigns reviewers to evaluate each preliminary proposal.
- 4. Preliminary proposal reviewers receive access to the proposals, evaluate them, and complete their comments and scores.
- 5. IMLS convenes preliminary proposal review panels for reviewers to discuss scores and the merits of the proposals.
- 6. IMLS staff aggregate reviewer comments and scores and make invitation decisions.
- 7. IMLS invites select applicants to submit full proposals. Whether or not they are invited to submit a full proposal, all applicants receive anonymized copies of their peer review comments and scores.

#### Phase Two

- 8. Invited applicants submit full proposals to IMLS.
- 9. IMLS checks the full proposals for eligibility and completeness.
- 10. IMLS identifies available reviewers with appropriate expertise and assigns reviewers

to evaluate each full proposal.

- 11. Full proposal reviewers receive access to the proposals, evaluate them, and complete their comments and scores.
- 12. IMLS staff members may hold calls with reviewers to discuss scores and the merits of the proposals, as needed.
- 13. IMLS staff members review the financial information of each potential grant and grantee, including a detailed check of the proposed budget.
- 14. Based on reviewer comments and scores, IMLS staff members recommend proposals for funding to the IMLS Director, who has the authority to make final funding decisions.
- 15. The IMLS Director makes all final funding decisions.
- 16. IMLS notifies all applicants whether they have received an award or not. With their notifications, all applicants receive anonymous copies of their reviews.

### **Review Process**

#### **IMLS** Completeness and Eligibility Review

IMLS staff review the eligibility and completeness of applications before distributing them for peer review.

#### Access to online portal

All review materials will be provided to you via the IMLS application review and grants management system maintained by IMLS. This system is called "eGMS Reach." It is both the online portal that you will use to receive materials for review and the system where you will input your reviews.

In order to access the online portal for the first time, you will receive a separate email (see example below) from IMLS providing instructions for accessing eGMS Reach. If you do not receive the email, please check your junk folder. If you still do not see the message, contact <u>imls-librarygrants@imls.gov</u>. The email body will include instructions for how to use Login.gov to access eGMS Reach.

From: IMLS-Reach <imls-reach@imls.gov> Sent: Wednesday, February 1, 2023 1:35 PM To: Julie XXXXX <xxx@imls.gov> Cc: IMLS-Reach <imls-reach@imls.gov> Subject: eGMS Reach Login Information</imls-reach@imls.gov></xxx@imls.gov></imls-reach@imls.gov>
Dear Julie,
Access to a panel or award has been granted to you in eGMS Reach, the system for application review and award management used by the Institute of Museum and Library Services. If you manage multiple awards, you will receive additional notifications as access to each is granted.
You must have a Login.gov account associated with a unique-to-you email address that matches your eGMS Reach primary email address to access eGMS Reach.
Please go to eGMS Reach at https://testweb.egmsa.neh.gov/IMLS/Staging/egms-reach/ to sign in. If you are new to eGMS Reach, choose a prompt on the login page to:
<ol> <li>Log in using your existing Login.gov account that is associated with this email address;</li> <li>Add this email address to your existing Login.gov account that is associated with a different email address, or</li> <li>Create a new Login.gov account.</li> </ol>
If you encounter any issues accessing eGMS Reach, visit the eGMS Reach User Resources page or contact Reach-HelpDesk@imls.gov for assistance.

Please alert IMLS staff immediately if you have not received your access email, if any materials are missing, you cannot open them, or if you encounter any other issues.

Upon receipt of the email, you should log into eGMS Reach. After you have completed the successful login, please ensure that you can access your reviewer materials. To do this, click on the "Go To Panel" button for your panel. Your panel will have a name that begins with "FY24\_LB21."

My Panels		
	Name	
Co to Panel RE-OLS-22-17883	FY22_LB21_RetDev_PR_1	

The Panel section of eGMS Reach will provide you with the information you need to perform and submit your reviews. It begins with IMLS contact information for the panel, followed by your reviewer materials and then includes the applications you will be reviewing.

Your review process consists of three main activities:

- Preparing to begin peer review by reading available documentation
  - o Quick Reference Guide
  - Reviewer Handbook (this document)
  - Notice of Funding Opportunity
- Confirming no Conflicts of Interest (you must check this box before accessing the proposals)
- Reading and reviewing the applications

Using the online portal eGMS Reach, you will complete an evaluation form that includes written comments and asks you to assign one "Grade" or score for each application. More guidance on evaluating applications is provided in this document, but if any application seems to be missing pages or other information, please contact <u>imls-librarygrants@imls.gov</u>.

Please note that all reviews are due by Thursday, May 23, 2024.

## **Conflict of Interest Statement**

Before proceeding to the Applications Tab, you must affirm that you have reviewed and approved the conflict of interest statement located under your Personal Files and in the Complying with Ethical Obligations and Avoiding Conflicts of Interest section of this document. Click on the paper icon to review Complying with Ethical Obligations and Avoiding Conflicts of Interest. Then click on the pen icon to affirm that you have reviewed this file and approved its contents. Once you begin reviewing your assigned proposals, you may identify other conflicts. Contact us immediately if you identify any potential conflicts of interest.

# Confidentiality

The information contained in grant proposals is strictly confidential. Do not discuss or reveal names, institutions, project activities, or any other information contained in the proposals. Contact IMLS if you have any questions concerning a proposal. Do not contact applicants directly or post on social media about your involvement in the process. Because Artificial Intelligence (AI) generative tools rely upon the submission of substantial information, and because AI users are unable to control where the information they have submitted will be sent, saved, viewed, or used in the future, IMLS explicitly prohibits its peer reviewers from using AI tools to analyze and critique IMLS grant applications.

# Managing records

Keep the proposals, a copy of your reviews, and any notes about the proposals in case there are questions from IMLS staff. Please destroy your review materials after awards are made.

# **Glossary of terms**

At times, the vocabulary used on the IMLS grants management portal, eGMS Reach, does not completely match the common IMLS vocabulary. We may use terms interchangeably throughout our instructions and in the online eGMS Reach interface. Here is a breakdown of common terms you will come across while completing your review:

- Panel: The online space in which you will be completing the review process
- Coordinator: IMLS staff member available for technical questions you may have
- Chair: IMLS staff member available for content-based questions you may have
- Evaluation: Your reviewer comments and feedback that are provided to applicants
- Applications: Proposals from applicants that you will be reviewing
- Application Number: The unique identifier assigned to each proposal
- Primary Person/Individual: Project Director (PD) or Principal Investigator (PI)
- Primary Institution: The lead applicant and fiscal agent for a project
- Grade: The single score or number you will provide for each proposal.

## **Reading proposals**

Your thorough reading and understanding of each proposal will be key to providing insightful comments aligned with your overall grade or score for the proposal. Before you review the proposals, please ensure you are familiar with the program Notice of Funding Opportunity (which can be found on our website, is linked below, and is available in your eGMS Reach portal), and reference it as needed throughout the review process.

Please review the Notice of Funding Opportunity (NOFO) for FY 2024 (PDF, 694KB)

We estimate that it may take one to three hours to evaluate one proposal. First time

reviewers may require additional time. For all questions about reviewing, either technical or programmatic, contact IMLS staff.

# Writing comments

As you are typing your reviews into eGMS Reach:

- Please do not have more than one of the review forms open at the same time. The autosave will NOT work and you will lose your information.
- We recommend saving frequently to avoid losing any of your work.
- Please also use the Plain text feature for pasting or editing your comments

Write comments of 3-5 sentences minimum for each of the review questions:

- Project Justification
- Project Work Plan
- Diversity Plan
- Project Results

Sub-questions to each section are provided for your reference within the review form, though do not necessarily need to be answered individually.

Reviewer comments are used by IMLS staff to inform funding decisions and are provided to both successful and unsuccessful applicants to help improve their projects or future proposals. When drafting your comments:

- Present comments in a constructive and professional manner to help the applicant improve their proposal.
- Analyze the proposal in your comments; summarizing or paraphrasing the applicant's own words will not help the applicant.
- Use your professional knowledge and experience to assess the information objectively.
- Comments should be addressed to the applicants, not IMLS staff.
- Make sure your comments justify the scores you provide. A highly complementary comment does not remove the sting of a low score, and a negative comment does not even out a high one. Comments and scores must complement each other and make sense as a whole.

Characteristics of effective comments:	Characteristics of poor comments:
<ul> <li>Presented in a constructive manner</li> <li>Concise, easy to read and understand</li> <li>Specific to the individual proposal</li> <li>Reflect your experience and expertise</li> <li>Correlate with the given score</li> <li>Reflect the proposal's strengths and identify areas for improvement</li> <li>Based on the NOFO criteria</li> </ul>	<ul> <li>Make derogatory remarks</li> <li>Question an applicant's honesty or integrity</li> <li>Offer or ask for irrelevant or extraneous information</li> <li>Offer limited explanation or detail</li> <li>Reflect personal biases or impact reviewer anonymity</li> </ul>

Below are some examples of effective reviewer comments:

How well does the proposal address the goals and objectives of	the grant program?
"With the partnerships in place and the national-level need for	Comment is substantive,
preserving private and sensitive content, this project addresses the	addresses the review
goals and objectives of the grant program. The authors of the proposal	criteria, and employs a
plan to include experts in the field and support personnel as well as	positive tone.
librarians or archivists as partners in the planning and execution of the	
project. They also demonstrate expertise in the subject and plan to	
collaborate to fill any gaps in their current knowledge. Many	
universities experience this need and work towards resolving it will	
certainly support the filling of gaps in our national digital infrastructure.	
More stable preservation of this sensitive material will serve the	
population at large by making health and related data more securely	
preserved (both from loss and from exposure)."	
"You make a strong case for the library to partner with the University to	
provide research expertise and the results clearly meet the needs of	the score of 1 and makes
your target audience. However, I believe that the problem you identify is	
one based in your community rather than in the library field and does	for seeking other funding.
not meet the NLG-Library program goals of demonstrating national	
impact or using an innovative approach. Consider applying to opportunities with your state library or a local foundation."	
What elements are in place and what elements are missing for suc	ressful execution of the
proposed project? What recommendations do you have for imp	
"The partnerships outlined in the proposal will be very important to the	• • •
successful completion of the project. I would recommend connecting	constructive assessment of
with more office of research personnel especially those involved in the	
Data Use Agreement workflows of their universities. Planning to	and specific suggestions the
contract with and pay experts assures me that you understand that this	
project cannot be successful without these perspectives."	
Considering the topic, project type selection, amount of funds reques	ted, and scope of potential
impact, should the applicant be funded at this time? Why or why not	
"I do recommend this proposal be funded. I think that it is an important	
area of growth for academic libraries. I also think that this is good to	questions from the review
fund as a planning grant, because it could become a project to actively	criteria and includes detail
resolve the gaps by using the report and other findings from this work.	on a specific topic the
Also, please make sure you clearly explain how this project is distinct	reviewer would need to see
from other projects funded in this area. For submitting a full proposal,	in a full proposal.
please clearly explain how this project is taking lessons from previous	
projects to move the field forward."	

In contrast, below are some examples of poor reviewer comments:

How well does the proposal address the goals and objectives of the	grant program?	
"The library plans to organize a series of experimental interactive education	Comment paraphrases	
programs on the topic of income equity and evaluate them to determine	the applicant's own	
which prove most successful in meeting their desired learning outcomes for	words.	
their high school participants. They will share the results on a project		
website."		
What elements are in place and what elements are missing for success		
proposed project? What recommendations do you have for improvir	ng the proposal?	
"The work plan would be improved by putting in more time onsite."	Comment is very brief	
	and has little value to	
	the applicant.	
Considering the topic, project type selection, amount of funds requested,	and scope of potential	
impact, should the applicant be invited be funded at this time? Why or why not?		
"The design of this research study is wrong-headed and will not yield any	Comment is derogatory	
useful data. The staff is woefully unprepared and will fail in the execution of	and does not provide	
this project. Targeting federal funds to this project is a mistake."	useful feedback.	
"Otrong regults with your quetainable benefite"	Commont in your krief	
"Strong results with very sustainable benefits."	Comment is very brief	
	and has little value to	
	the applicant.	

# Scoring

After you have read, evaluated, and written comments for each proposal, please provide a single numeric grade or score from 1-5 (5 being the highest) that reflects your opinion of the proposal's overall quality and your recommendation of whether it should be funded or not. A score of 3 or above is typically considered "fund-able." (See the Guidance for Assigning Scores below for more information.)

To help applicants understand and benefit from your reviews, make sure that your scores accurately reflect your written comments. There is no "submit" button for reviews in the eGMS Reach system and your reviews will automatically save as you work. Once you are finished will all your reviews, please email your assigned Panel Chair and let them know.

### Guidance for Assigning Scores

	Excellent	5	The proposal <i>exemplifies</i> a goal and objective of the grant program, has <i>all</i> the elements in place for successful execution of the proposed project, and is designed to ensure far-reaching impact (as described in the <u>Notice of Funding</u> <u>Opportunity</u> ). You recommend funding the proposal without reservation.
	Very Good	4	The proposal <i>mostly</i> demonstrates a goal and objective of the grant program, has <i>most</i> of the elements in place for successful execution of the proposed project, and is designed to ensure far-reaching impact. <u>You recommend</u> <u>funding the proposal.</u>
	Good	3	The proposal <i>somewhat</i> demonstrates a goal and objective of the grant program, has <i>some</i> of the elements in place for successful execution of the proposed project, and is designed to ensure far-reaching impact. <u>You recommend</u> <u>funding the proposal but acknowledge it could be more</u> <u>successful with some changes.</u>
Do not fund	Some Merit	2	The proposal <i>does not</i> demonstrate a goal and objective of the grant program, has <i>few</i> of the elements in place for successful execution of the proposed project, and/or is not designed to ensure far-reaching impact. You do not recommend the proposal for funding but think it could be strengthened for resubmission in a future grant cycle.
	Inadequate	1	The proposal <i>does not</i> demonstrate a goal and objective of the grant program, has <i>few or none</i> of the elements in place for successful execution of the proposed project, and is not designed to ensure far-reaching impact. You do not recommend the full proposal for funding or resubmission.

# Purpose and Scope of the Laura Bush 21st Century Librarian Program

The Laura Bush 21<sup>st</sup> Century Librarian Program (LB21) is designed to support the development of a *diverse* workforce of librarians and archivists in order to meet the information needs of their communities.

Projects are expected to:

- propose far-reaching impact to influence practice across one or more disciplines within the libraries and archives fields;
- reflect a thorough understanding of current practice, knowledge about the subject matter, and an awareness of and support for current strategic priorities in the field;

• use collaboration to demonstrate broad need, wide buy-in and input, and access to appropriate expertise.

#### IMLS agency-level goals

The mission of the Institute of Museum and Library Services (IMLS) is to advance, support, and empower America's museums, libraries, and related organizations through grantmaking, research, and policy development.

The Laura Bush 21<sup>st</sup> Century Librarian Program supports the achievement of agency-level Goal 1, Champion Lifelong Learning, and Objective 1.2, Support the training and Professional development of the museum and library workforce.

Throughout its work, IMLS places importance on diversity, equity, and inclusion. This may be reflected in an IMLS-funded project in a wide range of ways, including efforts to serve individuals of diverse geographic, cultural, and socioeconomic backgrounds; individuals with disabilities; individuals with limited functional literacy or information skills; individuals having difficulty using a library or museum; and underserved urban and rural communities, including children from families with incomes below the poverty line.

This may also be reflected in efforts to recruit and develop future professionals in the library or museum fields (e.g., paid internships), develop strategies for building or enhancing access to collections and information, and compensate project participants (e.g., students, staff, community members, advisors) as appropriate for their time and expertise.

#### LB21 program-level goals and objectives

Each applicant should align their proposed project with one of these program goals and one or more of the associated objectives. Please note the goals are not numbered in order of priority.

The goals for this program are to generate projects of broad impact that:

Goal 1: Recruit, train, develop, and retain a diverse workforce of library and archives professionals.

- Objective 1.1: Develop or enhance programs specifically to encourage students of diverse and underrepresented backgrounds at the middle school, high school, and postsecondary levels to pursue careers in library and information science. Delivery mechanisms may include, but are not limited to, summer institutes, workshops, certificate programs, and online networks.
- Objective 1.2: Collaborate with formal and/or informal learning organizations to incorporate promising practices from allied domains into library and archives services. Partners may include, but are not limited to, museums, school systems, universities, extension programs, youth-serving organizations, departments of correction, and workforce or economic development organizations.
- Objective 1.3: Develop training for library and archives workforces to support families, groups, and individuals of diverse cultural and socioeconomic backgrounds

and needs including but not limited to young children and their caregivers, tweens and teens, un- and under-employed adults looking to make career transitions or reenter the workforce, veterans, immigrants and refugees, individuals with disabilities, English-language learners, and senior citizens.

Goal 2: Develop faculty, library, and archives leaders by increasing the institutional capacity of libraries, archives, and graduate programs related to library and information science.

- Objective 2.1: Support the preparation and implementation of large-scale organizational change addressing diversity, equity, and inclusion. Activities may include, but are not limited to, needs assessments; formal and informal training at the individual and group level in relevant areas such as cultural awareness and competence, cross-cultural knowledge and skills, stakeholder management and engagement, organizational dynamics, and agile project management; facilitated cross-departmental workshops; and external evaluation.
- Objective 2.2: Create initiatives, activities, and curricula that reduce equity gaps and address issues of diversity, equity, and inclusion in the recruitment, development, and retention of faculty, library, and archives leaders from diverse and underrepresented backgrounds.
- Objective 2.3: Support the research of untenured tenure-track library and information science faculty, furthering the faculty member's long-term research agenda, career trajectory, and professional development.

Goal 3: Enhance the training and professional development of the library and archival workforce to meet the needs of their communities. o

- Objective 3.1: Develop training to equip the library and archival workforce to engage in sustained community development. Approaches may include, but are not limited to, design thinking, data analytics, impact assessment, leadership development, organizational change, asset mapping, and collective impact.
- Objective 3.2: Create and/or refine training programs that build library and archival workforce skills and expertise in contributing to the well-being of communities. This work may relate to workforce and economic development; financial, health, social, or legal services; or efforts that increase equity and access.
- Objective 3.3: Create and/or refine training programs to build library and archival workforce skills and expertise in developing engaging lifelong learning opportunities, fostering attitudes of discovery, cultivating critical and creative thinking skills, and facilitating experiential and self-directed learning opportunities for all.
- Objective 3.4: Support training of the library and archival workforce to advance digital inclusion for the benefit of community members. Approaches may include, but are not limited to, enhancing digital infrastructures, platforms, technologies, online services, connectivity, digital literacy, privacy, and security, as well as creating new processes and procedures needed to sustain a robust online environment.

 Objective 3.5: Support training of the library and archival workforce in digital collection management including, but not limited to, preservation and access to information and resources through retrospective and born-digital content; digital preservation strategies; community archives; web archiving; and improving cataloging and inventory practices.

#### **Project Types**

The project types are:

- Planning
- Forum
- Implementation
- Early Career Research Development
- Applied Research

Applicants must designate one of these project types.

Planning projects support exploratory activities, such as analyzing needs and feasibility; solidifying partnerships; developing project work plans; or developing prototypes, proofs of concept, and pilot studies. Applications should identify planning activities that have the potential to lead to future implementation. The period of performance for a Planning project is one to two years.

Forum projects support convening qualified experts and key stakeholders, including those from adjacent fields as appropriate, to help explore current or emerging issues or opportunities that are important to professional development and education-related issues in libraries and archives across the nation. Reports and other deliverables should be prepared for wide dissemination. Convenings should leverage technology, such as virtual meetings or live streaming, to allow broad participation. Additional mechanisms for engaging stakeholders and building awareness of the findings are encouraged. The period of performance for a Forum project is one to two years.

Implementation projects support developing faculty, library, and archives leaders and contributing to the professional development and retention of library and archives staff who serve the nation. Implementation projects may develop new tools and resources or expand existing products or services for new audiences or in new contexts. Applicants should design their proposed work to ensure that new practices have the potential to be easily adoptable, sustainable, and widely implementable across the field. The period of performance for an Implementation project is one to three years.

Early Career Research Development projects support the research of untenured tenure-track library and information science faculty, furthering the faculty member's long-term research agenda, career trajectory, and professional development. Early Career Research Development project proposals must have a single Project Director with no co-Project Directors; consultants and students may be included. The period of performance for an Early Career Research Development project is one to three years.

By the deadline for submission of Invited Full Proposals, the Project Director must:

- hold a doctoral degree,
- be untenured tenure-track library and information science faculty, and
- have both teaching and research responsibilities.

Applied Research projects support the investigation of key questions relevant to library or archival professional practice, building on prior empirical, theoretical, or exploratory work in libraries and archives or other relevant disciplines. <u>Applicants must include clearly</u> <u>articulated research questions and feature appropriate methods</u>, including relevant theoretical or conceptual approaches, data collection, and analysis. Findings and their implications for library and archival practice should be shared broadly throughout the grant period of performance, rather than exclusively at the end of the project. Dissemination activities should extend beyond publishing journal articles and presenting at academic conferences. Research projects should not be designed with a deterministic agenda or predetermined outcomes. Proposals focused on evaluation are not appropriate for the Applied Research project category and should be submitted under the Implementation project category above. The period of performance for an Applied Research project is one to three years.

#### **Guidance for Research Applications**

A research application should answer the following questions in the project Narrative:

- 1. What are the research questions, methods, and theoretical framing?
- 2. What is the relevance of the proposed research for current practice?
- 3. What type of data will the Project Director (PD) gather?
- 4. How will the PD collect, analyze, and use the data?
- 5. Does the study require Institutional Review Board (IRB) approval? If so, what steps will be taken to secure IRB approval?
- 6. How will the PD report and disseminate findings?

# Complying with Ethical Obligations and Avoiding Conflicts of Interest

As a reviewer for IMLS, you perform a vital role in ensuring the integrity of IMLS's peer review process and must carry out your duties in accordance with government ethics rules. Before you evaluate applications, we ask that you review the following *General Principles of Ethical Conduct* and *Summary of the Conflict of Interest Laws*. You will be asked to certify compliance with the IMLS Reviewer Conflict of Interest Statement and Certification. IMLS allocates up to one hour of your reviewer time for you to consider these materials.

If, at any time while performing your duties at IMLS, you believe you may have a conflict of interest, please contact the IMLS staff member coordinating your review process.

Other questions about the ethics rules and responsibilities may be directed to IMLS's Designated Agency Ethics Official at <u>ethics@imls.gov</u>; (202) 653-4787; 955 L'Enfant Plaza, SW, Suite 4000, Washington, DC 20024.

#### **General Principles of Ethical Conduct**

- 1. Public service is a public trust, requiring you to place loyalty to the Constitution, the laws, and ethical principles above private gain.
- 2. You shall not hold financial interests that conflict with the conscientious performance of duty.
- 3. You shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.
- 4. You shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by IMLS, or whose interests may be substantially affected by the performance or nonperformance of your duties.
- 5. You shall put forth honest effort in the performance of your duties.
- 6. You shall make no unauthorized commitments or promises of any kind purporting to bind the Government.
- 7. You shall not use public office for private gain.
- 8. You shall act impartially and not give preferential treatment to any private organization or individual.
- 9. You shall protect and conserve Federal property and shall not use it for other than authorized activities.
- 10. You shall not engage in outside employment or activities, including seekingor negotiating for employment, that conflict with official Government duties and responsibilities.
- 11. You shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
- 12. You shall satisfy in good faith your obligations as citizens, including all justfinancial obligations, especially those -- such as Federal, State, or local taxes -- that are imposed by law.
- 13. You shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.
- 14. You shall endeavor to avoid any actions creating the appearance that you are violating the law or the ethical standards.

#### Summary of Conflict of Interest Laws

18 U.S.C. § 201 – Prohibits you from acceptance of bribes or gratuities to influence Government actions.

18 U.S.C. § 203 – Prohibits you from accepting compensation for representational activities involving certain matters in which the United States is a party or has a direct and substantial interest.

18 U.S.C. § 205 – Prohibits you from certain involvement in claims against the United States or representing another before the Government in matters in which the United States is a party or has a direct and substantial interest.

18 U.S.C. § 207 – Imposes certain restrictions on you related to your activities after Government service.

18 U.S.C. § 208 – Prohibits you from participating in certain Government matters affecting your own financial interests or the interests of your spouse, minor child, general partner, or organization in which you are serving as an officer, director, trustee, general partner, or employee.

18 U.S.C. § 209 – Prohibits you from being paid by someone other than the United States for doing their official Government duties.

#### **Reviewer Conflict of Interest Statement**

As a reviewer or panelist for IMLS, you may receive a grant application for review that could present a conflict of interest. Such a conflict could arise if you are involved with the applicant institution, or in the project described in the application, as a paid consultant or through other financial involvement. The same restrictions apply if your spouse or minor child is involved with the applicant institution or if the application is presented on behalf of an institution with which you, your spouse or minor child is negotiating for future employment.

A present financial interest is not the only basis for conflict of interest. Through prior association as an employee or officer, you may have gained knowledge of the applicant that would preclude objective review of its application. Past employment (generally more than five years) does not by itself disqualify a reviewer so long as the circumstances of your association permit you to perform an objective review of the application. If you believe you may have a conflict of interest with any application assigned to you for review, please notify us immediately.

You may still serve as a reviewer even if your institution is an applicant in this grant cycle or you were involved in an application submitted in this grant cycle, as long as you do not review any application submitted by your own institution or any application in which you were involved.

However, if you believe that these or any other existing circumstances may compromise your objectivity as a reviewer, please notify us immediately.

If an application presents no conflict of interest at the time you review it, a conflict of

interest may still develop later on. Once you have reviewed an application, you should never represent the applicant in dealings with IMLS or another Federal agency concerning the application, or any grant that may result from it.

It is not appropriate, for your purposes or for the purposes of the institutions or organizations you represent, for you to make specific use of confidential information derived from individual applications that you read while you were serving as an IMLS reviewer. In addition, pending applications are confidential. Accordingly, you must obtain approval from IMLS before sharing any proposal information with anyone, whether for the purpose of obtaining expert advice on technical aspects of an application or for any reason.

If you have any questions regarding conflict of interest, either in relation to a specific application or in general, please contact the IMLS staff member who is coordinating the review process.

# Protecting Sensitive Data at IMLS

IMLS is committed to protecting your private, sensitive information and employs the following physical and technical safeguards when collecting reviewer and panelist information:

- 1. Email Security. IMLS email is hosted on a cloud computing infrastructure which has been reviewed and approved as meeting the security requirements of the Federal Risk and Authorization Management Program (FedRAMP). FedRAMP is a governmentwide standardized program for security assessment, authorization, and monitoring of cloud products and services. FedRAMP requirements are based on (and surpass) the Security and Privacy Controls for Federal Information Systems and Organizations developed by the National Institute of Standards and Technology. FedRAMP's additional security controls address the unique elements of cloud computing to ensure all federal data is secure in cloud environments.
- 2. Secure File Transmission. IMLS Secure File Upload uses Hypertext Transfer Protocol Secure (HTTPS), a transmission protocol that verifies the identity of a website or web service for a connecting client and encrypts nearly all information sent between the website or service and the user. HTTPS is designed to prevent this information from being read or changed while in transit. HTTPS is a combination of HTTP and Transport Layer Security (TLS). TLS is a network protocol that establishes an encrypted connection to an authenticated peer over an untrusted network.
- Secure File Storage. IMLS will only store secure files and any related passwords as long as necessary to complete the relevant transaction or process. A physical copy of personally identifiable information (PII) may be printed at IMLS for business use, after which the copy is secured in a locked location and destroyed after the business use ceases.
- 4. Access Controls. IMLS employs access controls to restrict access to sensitive information that is stored electronically. Access to IMLS files is restricted to authorized IMLS staff, and sensitive data is stored in folders that can only be accessed by a restricted set of authorized users. Files containing sensitive information are password-protected, providing an additional layer of security.

5. Records Policies. IMLS financial transaction records are subject to the agency's record retention policy and disposed of in accordance with the General Services Administration's General Records Schedule.