



# National Leadership Grants for Libraries Phase One Reviewer Handbook

Office of Library Services  
Fiscal Year 2025

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## Welcome

Thank you for agreeing to serve as a peer reviewer for this year's National Leadership Grants for Libraries 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 reach out to your IMLS contact at any time.

Once again, thank you for the service you are about to render to libraries and archives 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. Panel reviews are held to discuss scores and the merits of the proposals, as needed.
6. IMLS staff aggregate reviewer comments and scores and make invitation decisions.
7. IMLS invites select applicants to submit full proposals. All applicants receive anonymized copies of their peer review comments and scores, regardless of whether they are invited.

### 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, if 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, and provides anonymous copies of their peer review comments and scores .

## 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 the agency. 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.

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 [imls-librarygrants@imls.gov](mailto:imls-librarygrants@imls.gov).

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

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.

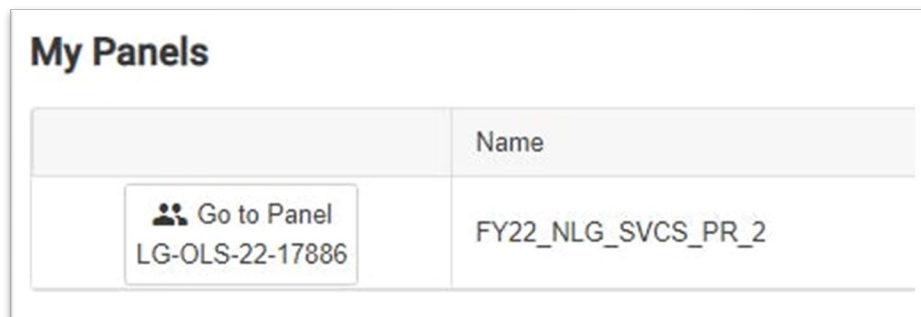
Please go to eGMS Reach at <https://testweb.egmsa.neh.gov/IMLS/Staging/egms-reach/> to sign in. If you are new to eGMS Reach, choose a prompt on the login page to:

1. Log in using your existing Login.gov account that is associated with this email address;
2. Add this email address to your existing Login.gov account that is associated with a different email address, or
3. Create a new Login.gov account.

If you encounter any issues accessing eGMS Reach, visit the [eGMS Reach User Resources page](#) or contact [Reach-HelpDesk@imls.gov](mailto: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 “FY25\_NLG.”



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
  - Quick Reference Guide
  - Reviewer Handbook (this document)
  - Notice of Funding Opportunity
- Confirming no Conflicts of Interest (you must check this box within eGMS Reach 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 [imls-librarygrants@imls.gov](mailto:imls-librarygrants@imls.gov).

Please note that all reviews are due by **Wednesday, November 20, 2024**.

For additional information about using eGMS Reach, please reference [How to Review Applications in eGMS Reach](#).

## 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. Yes, this step is in addition to the e-mail correspondence you already had with your IMLS contact regarding potential institutional conflicts of interest.

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 generative AI 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 and a copy of your reviews 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 [FY25 NLG Notice of Funding Opportunity \(PDF\)](#).

We estimate that it may take up to an hour to evaluate one proposal. First time reviewers may require additional time.

## 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 (Optional): The Diversity Plan is optional this year. If there is not a Diversity Plan included, write “N/A” in this section and do not factor this section into your overall review comments or score. If there is a Diversity Plan included, please consider the Diversity Plan in your overall review.
- Project Results and Overall Impact

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.
- Address comments 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.
- If there is not a Diversity Plan included, please do not comment on its absence or factor it into your overall review comments or score.

| Characteristics of effective comments:  | Characteristics of poor comments:   |
|---|---|
| <ul style="list-style-type: none"> <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 style="list-style-type: none"> <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 current, significant needs, problems, or challenges in the field? How well does it differ from, complement, build on, or adapt existing models, standards, theories, scholarship, or practice? How well does the proposal align with the NLG program goal & objective?**

“With the partnerships in place and the national-level need for preserving private and sensitive content, this project addresses the goals and objectives of the grant program. The authors of the proposal plan to include experts in the field and support personnel as well as 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).”

*Comment is substantive, addresses the review criteria, and employs a positive tone.*

“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 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 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.”

*Comment correlates with the score of 1 and makes implementable suggestions for seeking other funding.*

**What elements are in place and what elements are missing for successful execution of the proposed project? What recommendations do you have for improving the proposal?**

“The partnerships outlined in the proposal will be very important to the successful completion of the project. I would recommend connecting with more office of research personnel especially those involved in the Data Use Agreement workflows of their universities. Planning to contract with and pay experts assures me that you understand that this project cannot be successful without these perspectives.”

*Comment provides a constructive assessment of the application and specific suggestions the applicant could implement.*

**How well do the intended results support the project’s purpose and will the results be well disseminated to the intended audiences? Considering the topic, project type selection, amount of funds requested, dissemination plan, evaluation plan, and scope of the potential impact, should the applicant be invited to submit a full proposal at this time? Why or why not?**

“The applicant has thoughtfully considered ways to disseminate the project results including through an existing website, blog posts, webinar, and journal articles. The applicant has thought about practical ways of getting the project results in front of practitioners and not just researchers. I recommend this proposal be invited. I think that it is an important area of growth for academic libraries. I also think that this is good to move forward as a planning grant, because it could become a project to actively resolve the gaps by using the report and other findings from this work. Also, please make sure you clearly explain how this project is distinct from other projects funded in this area. For submitting a full proposal, please clearly explain how this project is taking lessons from previous projects to move the field forward.”

*Comment addresses questions from the review criteria and includes detail on a specific topic the reviewer would need to see in a full proposal.*

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

|   |  |
|---|--|
| <p><b>How well does the proposal address current, significant needs, problems, or challenges in the field? How well does it differ from, complement, build on, or adapt existing models, standards, theories, scholarship, or practice? How well does the proposal align with the NLG-L program goal and objective?</b></p>   |  |
| <p>“The library plans to organize a series of experimental interactive education programs on the topic of income equity and evaluate them to determine which prove most successful in meeting their desired learning outcomes for their high school participants. They will share the results on a project website.”</p>  | <p><i>Comment paraphrases the applicant’s own words.</i></p>               |
| <p><b>What elements are in place and what elements are missing for successful execution of the proposed project? What recommendations do you have for improving the proposal?</b></p>   |  |
| <p>“The work plan would be improved by putting in more time onsite.”</p>  | <p><i>Comment is very brief and has little value to the applicant.</i></p> |
| <p><b>How well do the intended results support the project’s purpose and will the results be well disseminated to the intended audiences? Considering the topic, project type selection, amount of funds requested, dissemination plan, evaluation plan, and scope of the potential impact, should the applicant be invited to submit a full proposal at this time? Why or why not?</b></p> |  |
| <p>“The design of this research study is wrong-headed and will not yield any useful data. The staff is woefully unprepared and will fail in the execution of this project. Targeting federal funds to this project is a mistake.”</p>   | <p><i>Comment is derogatory and does not provide useful feedback.</i></p>  |
| <p>“Strong results with very sustainable benefits.”</p>   | <p><i>Comment is very brief and has little value to the applicant.</i></p> |

## Assigning Scores

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 “invite-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 that notifies the IMLS staff when you are completed with your reviews, but the eGMS Reach system will automatically save as you work. As you complete each application review, please click the button indicating “This evaluation is complete”. Once you are finished will all your reviews, please email your assigned Panel Chair and let them know.

## Guidance for Assigning Scores

|               |            |   |  |
|---------------|------------|---|--|
| Invite-able   | Excellent  | 5 | The proposal <i>exemplifies</i> the NLG program goal, 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 <a href="#">Notice of Funding Opportunity</a> ). <u>You recommend inviting a full proposal without reservation.</u>                        |
|               | Very Good  | 4 | The proposal <i>mostly</i> demonstrates the NLG program goal, 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 inviting a full proposal.</u>   |
|               | Good       | 3 | The proposal <i>somewhat</i> demonstrates the NLG program goal, 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 inviting a full proposal but acknowledge it could be more successful with some changes.</u>                                     |
| Do not invite | Some Merit | 2 | The proposal <i>does not</i> demonstrate the NLG program goal, 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. <u>You do not recommend inviting a full proposal but think the proposal could be strengthened for resubmission in a future grant cycle.</u> |
|               | Inadequate | 1 | The proposal <i>does not</i> demonstrate the NLG program goal, has <i>few</i> of the elements in place for successful execution of the proposed project, and is not designed to ensure far-reaching impact. <u>You do not recommend inviting a full proposal or resubmission.</u>  |

## Review Panels

When the panel convenes, we will discuss each proposal. While our time is limited, we should be able to go over the proposals in sufficient detail. We do not need to reach consensus on any proposal, but **you will have the opportunity to adjust your scores and add to or revise your comments after each proposal is discussed. You must finalize scores and comments before the end of the panel.**

For all questions about reviewing, either technical or programmatic, contact IMLS staff.

## Purpose and Scope of the National Leadership Grants for Libraries Program

The NLG program supports projects that address critical needs of the library and archives fields and have the potential to advance practice in these professions to strengthen library and archival services for the American public.

We expect NLG-L projects to:

- influence practice across one or more disciplines within the library 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, as needed, to demonstrate buy-in, input, and access to appropriate expertise;
- employ inclusive outreach strategies to disseminate activities, results, and findings; and
- generate measurable results such as new services, programs, models, tools, or research findings, that can be widely used, adapted, scaled, or replicated to extend and leverage the benefits of federal investment.

### IMLS agency-level goals and objectives

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.

Guiding our grantmaking are three agency-level goals with two objectives each.

- **Goal 1: Champion Lifelong Learning**
  - Objective 1.1: Advance shared knowledge and learning opportunities for all.
  - Objective 1.2: Support the training and professional development of the museum and library workforce.
- **Goal 2: Strengthen Community Engagement**
  - Objective 2.1: Promote inclusive engagement across diverse audiences.
  - Objective 2.2: Support community collaboration and foster civic discourse.
- **Goal 3: Advance Collections Stewardship and Access**
  - Objective 3.1: Support collections care and management.
  - Objective 3.2: Promote access to museum and library collections.

The NLG program supports the achievement of these agency-level goals to facilitate the delivery of significant results.

### NLG-L program-level goal and objectives

Each applicant should align their proposed project with the program goal and one associated objective.

#### **NLG-L Program Goal:**

Develop, enhance, or disseminate replicable practices, programs, models, or tools to strengthen library and archival services for the American public.

- Objective 1.1 Serve the learning needs of the public through libraries and archives.
- Objective 1.2 Improve community well-being through libraries and archives.
- Objective 1.3 Provide broad access to and preservation of information and collections through libraries and archives.
- Objective 1.4 Provide services to affected communities in the event of an emergency or disaster.

## Project Types

The project types are:

- Planning
- Forum
- Community-Centered Implementation
- National Implementation
- Applied Research

Applicants must designate one of these project types.

**Planning projects** support exploratory activities, such as analyzing needs and feasibility; solidifying partnerships; or developing project work plans, prototypes, proofs of concept, and pilot studies. Applications should identify planning activities that have the potential to lead to future implementation or research and have far-reaching impact. Planning projects should demonstrate how they will measure and achieve far-reaching impact.

The period of performance for a Planning ject 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 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. Forum projects should demonstrate how they will measure and achieve far-reaching impact.

The period of performance for a Forum project is one to two years.

**Community-Centered Implementation projects** adapt existing practices, findings, models, tools, and/or partnerships to address community needs. Applicants must identify and align their proposed work with established standards, practices, toolkits, open-source software, or research findings—leveraging existing IMLS-funded work when relevant. Projects should share

resources and lessons learned that can be used by libraries and archives in other communities throughout the nation.

The period of performance for a Community-Centered Implementation project is one to two years.

**National Implementation projects** support the development, execution, and evaluation of work that transforms how libraries and archives serve the nation. 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 services, practices, findings, models, tools, and/or partnerships can be easily adaptable, sustainable, and widely implementable across the field to ensure far-reaching impact.

The period of performance for a National Implementation project is one to three years.

**Applied Research projects** support the investigation of key questions relevant to libraries or archives, building on prior empirical, theoretical, or exploratory work in libraries and archives or other relevant disciplines. Applicants must include clearly articulated research questions and feature appropriate methods, including relevant theoretical or conceptual approaches, data collection, and analysis. Dissemination activities should occur throughout the period of performance and include activities beyond publishing journal articles and presenting at academic conferences to ensure far-reaching impact beyond just the academic research community. Proposals focused on evaluation or designed with a deterministic agenda are not appropriate for the Applied Research project type.

The period of performance for an Applied Research project is one to three years.

## 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 the IMLS Designated Agency Ethics Official at [ethics@imls.gov](mailto:ethics@imls.gov); (202) 653-4787.

## 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 seeking or 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 just financial 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 government-wide 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.
3. **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.