



# Equity Action Plan

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APRIL 2022

## Institute of Museum and Library Services Agency Equity Action Plan

### (1) Executive Summary

The Institute of Museum and Library Services is an independent grantmaking agency and the primary source of Federal support for the Nation's libraries and museums. The mission of IMLS is to advance, support, and empower America's museums, libraries, and related organizations through grantmaking, research, and policy development. Our vision is a Nation where museums and libraries work together to transform the lives of individuals and communities.

IMLS has identified five sets of actions to address identified barriers to equity across our grantmaking and procurement activities. The first three prioritized activities below provide the program-related scaffolding necessary to promote equity in the underserved and underrepresented communities served by museums and libraries across the country. Actions #4 and 5 are focused on Civil Rights and Contracting and Procurement, respectively.

Action #1 articulates the agency's need for better data collection to strengthen understanding of our underserved and underrepresented communities and make data-informed decisions about agency programs. Current agency data collection practices do not adequately capture the information the agency needs to effectively direct agency resources to historically underserved and underrepresented communities through museum and library stakeholders.

Action #2 addresses engagement and capacity limitations within museums and libraries that will help remove barriers across the dimensions of equity. IMLS seeks to strengthen agency participation and sector engagement among target institutions and their staff serving historically underserved and underrepresented groups.

Action #3 focuses on promoting the diversification of the museum and library fields themselves through the launch of an initiative funding paid internships, sponsorships, and fellowships from high school through mid-career. Over time this initiative will assist in mitigating demographic gaps in representation across the professions that contribute to museums' and libraries' ability to serve their communities effectively.

Action #4 acknowledges IMLS's capacity gap to provide the systemic framework to fully inform, equip, train, and otherwise support grantees to fulfill their wide range of Civil Rights compliance responsibilities and implement equity-driven initiatives.

Action #5 addresses the contracting process: IMLS's principal method for reaching underrepresented participants in contracting and procurement is through the small business preference programs under the Federal Acquisition Regulation Part 19 and Section 8(a) of the Small Business Act. We have identified three sets of barriers we seek to mitigate relating to IMLS's Specialized Work, Limited Window for Offeror Response, and the viability of Service-Disabled Veteran-Owned Small Businesses (SDVOSB) and Historically Underutilized Business Zones (HUBZone) to compete for large contracts.

## (2) Summary of Early Accomplishments

IMLS is committed to identifying and addressing barriers to equity across its grantmaking and contracting processes. The action plan laid out below is our vision for the path forward, building on steps already taken even prior to the last year:

- Engagement Evaluation: In July 2021, IMLS contracted with the Urban Institute of Washington, D.C., to conduct an evaluation of IMLS engagement across grant processes to identify gaps in methods that may impact engagement with underserved institutions and beneficiaries (which may include low income, rural, and racially/ethnically diverse communities). The Urban Institute analyzed FY 2020 awardees under 16 IMLS grant programs with 3,120 applicants and 620 awards.
- Internal Equity Assessment: In the summer and fall of 2021, IMLS hosted interviews with each of its offices to better understand staff perceptions of equity barriers and opportunities within its operations and grantmaking activities to make equity-driven strides. All agency staff members were invited to provide input into key questions related to their perceptions of equity within agency activities such as outreach, communications, technical assistance, process, and engagement. The exercise provided valuable information, especially information about IMLS' grantmaking efforts; and staff were excited to share their input and insights. Some high-level findings include:
  - o staff reported that IMLS has limited capacity to conduct outreach and provide technical assistance. When grantees and applicants receive such outreach and assistance, their feedback to staff indicates both have high value.
  - o a need to collect better data about IMLS and its equity efforts, in particular equity data about the institutions that do not (and perhaps cannot) apply for grants, the barriers to applying, and, as a result, the potential populations being underserved by Federal funding.
  - o the importance of equity when engaging more meaningfully with underrepresented and underserved populations, underscoring a need to see these populations represented within the organizational structures themselves through intentional training and hiring of employees who represent the populations they serve.
- Small Business Contracts: IMLS continues to exceed its targets for making contracts with small businesses:

### IMLS Small Business Goal Progress

<b>Business Type</b>	<b>SBA Goal</b>	<b>FY17</b>	<b>FY18</b>	<b>FY19</b>	<b>FY20</b>	<b>FY21</b>
Small Business	23%	52%	54%	61%	67%	62%
Woman-owned Small Business (WOSB)	5%	22%	20%	23%	38%	38%
Small Disadvantaged Business (SDB)	5%	26%	18%	18%	35%	34%
Service-disabled Veteran-owned Small Businesses (SDVOSB)	3%	1%	2%	2%	5%	0%
Historically Underutilized Business Zone (HUBZone)	3%	0%	5%	6%	0%	1%

Note: FPDS.gov data rounded up to the nearest percentage.

### **(3) Equity Action Plan**

#### **Action #1: Data Collection for Equity-based Grantmaking**

##### **A. Barrier to Equitable Outcome(s)**

Making data-informed decisions about agency programs with an equity lens requires the capacity to adequately collect and analyze the appropriate data about underserved and underrepresented communities. Starting with our CARES Act funds in FY 2020 and building in our subsequent funding in FY 2021, we introduced the use of census tract statistics on poverty, health, and education when making awards, with the goal of reaching the demographics most in need of support during the pandemic. Incorporating external data from the census and undertaking stakeholders' surveys can further assist our efforts to identify and target historically underserved and underrepresented groups and the museums and libraries that serve them. To continue this work, IMLS needs to better understand gaps in its data sources for a variety of activities in the museum and library fields.

A baseline equity assessment of agency grantmaking conducted by the Urban Institute in response to E.O. 13985 identified a gap in IMLS's capacity to apply an equity lens to its grantmaking. Current agency data collection practices do not facilitate decision-making processes that could more effectively direct agency resources to historically underserved and underrepresented communities through museum and library stakeholders. This data deficit adversely impacts the agency's ability to baseline and subsequently benchmark equity efforts in grantmaking, policy, research, and engagement.

Prior to undertaking the initial equity analysis of agency grantmaking data in support of E.O. 13985, the agency did initiate steps, despite the limited data, to target its grantmaking across three (3) equity dimensions: rural and small communities, majority BIPOC communities, and communities in poverty. The agency successfully implemented several targeted grant programs for institutions supporting organizations representing these three dimensions of historically underserved and underrepresented communities. As a result, the agency found that these targeted applicants can achieve high rates of success in these targeted programs when compared to rates of success in larger competitive programs. Over 79% of applicants from rural communities received awards in FY 2020 compared to nearly 19% applying to IMLS larger grant programs. Applicants from majority BIPOC communities fare slightly better in targeted grant programs with 40% receiving awards, compared to nearly 30% representation in larger grant programs. Applicants in communities with high poverty receive nearly 23% and 19% of grant awards in targeted and larger agency grant programs respectively. Prior to this initial equity assessment of its data, IMLS was unable to determine the full extent of its grantmaking impact across these dimensions of equity. This data presents an initial baseline upon which to benchmark agency grantmaking at the organizational level. IMLS still lacks beneficiary and reviewer data that can give a complete view of the agency's grantmaking from an equity lens. Closing existing gaps in data can significantly shape agency decision-making, policy and programs development, and research and engagement strategies that lead to full and equal participation and benefit in IMLS grantmaking across the dimensions of equity. For example, successful applicants have anecdotally identified participation in the review process as a contributing factor to their success as applicants. IMLS lacks substantive reviewer data to validate this claim, or to accurately assess the levels of participation of individuals and communities representing the historically underserved or underrepresented in the peer-review process.

## **B. Action and Intended Impact on Barrier**

Building on Urban Institute's FY 2021 preliminary equity assessment of IMLS's internal grantmaking data, IMLS will design and implement a continuous equity-centered data collection and evaluation strategy to address gaps in its current data-gathering practices and, in turn, inform equity-based decision making across all aspects of its programs, policy, and research with the primary goal of closing gaps by eliminating barriers to participation for historically underserved and underrepresented communities in agency programs.

## **C. Tracking Progress**

The IMLS Office of Research and Evaluation has outlined an evaluation strategy that allows for equity-focused data to be collected and analyzed to inform the agency's next steps toward removing persisting barriers to the underserved and underrepresented. Additionally, agency program staff will contribute to our equity-centered data collection efforts by conducting stakeholder surveys as a part of technical assistance efforts. Concurrently, IMLS will pivot and readjust to which communities we target our technical assistance outreach efforts – both to more effectively serve underrepresented communities (see Action #2 below), as well as to more successfully gather the necessary equity-based data required to make the proper equity-centered changes to our operations and grantmaking programs.

Near- to mid-term outcomes:

- IMLS has developed and applies equity baseline and benchmarks for grantmaking, policy development, technical assistance outreach practices, and related decision making; and
- Equity lens is applied to annual performance reporting to stakeholders.

Long-term outcomes:

- The agency can evidence the indirect and direct benefit of its grantmaking, technical assistance outreach, policy, and research for historically underserved and underrepresented communities, including:

- 1) Increases in applications and awards to organizations in the communities identified by the data as underrepresented and underserved across all grant programs; and
- 2) Increases in applications and awards to benefit and serve underrepresented communities more effectively.

## **D. Accountability**

IMLS will:

- Write performance targets around our equity data collection activities and report on our accomplishments and any amplification that results from this data collection in our Annual Performance Reports (APR); and
- Publish data on our website.

## **Action #2: Field Engagement and Technical Assistance**

### **A. Barrier to Equitable Outcome(s)**

IMLS's broad engagement with the museum and library fields has consisted of focused conference attendance, select presentations, mandated site visits for compliance, and technical assistance for grant applicants. Individuals from historically underserved and underrepresented groups and organizations working with these communities may not have sufficient access to these opportunities. The result is that these individuals and groups have limited representation and participation as grant reviewers, applicants, and ultimately beneficiaries of IMLS funding and resources.

Efforts to reduce barriers to entry to IMLS grantmaking and related resources have improved participation by organizations serving underserved and historically underrepresented communities. These efforts also have revealed these organizations' need for more extensive technical assistance to achieve full participation and benefits from IMLS programs and resources. During internal equity listening sessions, as well as external listening sessions with tribal communities and the small and rural library communities, both staff and stakeholders identified applicant capacity in writing and managing grants as a barrier. Internally, IMLS lacks the staff capacity to meet the level of technical assistance required by underserved stakeholders within the three dimensions of equity.

Anecdotally, grant recipients and reviewers have shared that participation in the IMLS grant review process is instrumental to their success as applicants. Data from the equity assessment currently is inadequate to support causation. A correlation between review participation and applicant success likely exists. Nearly 63% of IMLS reviewers represent organizations that have received IMLS funding. Ninety-five percent (95%) of reviewers are tied to organizations that were successful awardees once these reviewers participated in the review process. Across the three dimensions of equity and targeted grant programs, only 39% of reviewers were from BIPOC majority communities; 8% were from high poverty communities; and 2% were from rural communities in 2020–2021. This small representation of reviewers across these dimensions of equity creates a barrier for organizations serving these communities when compared with applicants from other communities. In addition to the insight gained from the review process, applicants who have engaged with IMLS program staff may be more likely to seek and benefit from technical support offered by the agency.

### **B. Action and Intended Impact on Barrier**

To address engagement and capacity issues that create barriers across the dimensions of equity, IMLS will diversify agency participation and sector engagement to target institutions and their staff serving historically underserved and underrepresented groups. This includes expanding staff involvement in conferences, meetings, workshops, and other events designed to support these institutions with the intention of developing relationships and cultivating new reviewers from within these communities. Recognizing the need for greater technical assistance among these applicants, IMLS will expand its capacity for providing technical assistance to meet the unique needs of these applicants and grantees.

We will analyze existing data on unsuccessful applicants and grantees that struggle with institutional capacity. Additionally, IMLS will conduct an evaluative exploration of its grant programs for the non-applicant pool of museum and library institutions within the United States. This effort will gather and analyze additional and new data to better understand the areas of major gaps in reaching eligible institutions. IMLS will further use these new data to examine the

correlation between non-applicants, rejected applicants, and awarded applicants and the communities and populations they benefit. Understanding these gaps will allow the agency to direct its limited resources towards more targeted outreach and application support for key communities of need.

These actions have been prioritized because both anecdotal and evaluation information indicate a strong correlation between these actions and success in agency grant programs. IMLS anticipates that over time these actions will reduce and eliminate barriers by improving access to agency resources, building trust with agency staff, and developing both agency and stakeholder capacity to support full and equal participation of organizations serving underserved and historically underrepresented communities.

### **C. Tracking Progress**

Near- to mid-term outcomes:

- Increase geographic and socioeconomic diversity in field engagement efforts by implementing a stakeholder engagement strategy that intentionally targets regions or communities with historically low representation within IMLS applicant and grantee pools. Strategies might include grant workshops and training, regional or state-level presentations, virtual and hybrid events, and site visits.
- Make data-informed decisions that increase IMLS presence and participation in specialized conferences designed to meet the needs of organizations serving historically underserved/underrepresented groups and focus on state conferences and meetings in states or regions underrepresented in the IMLS applicant/grantee pools.
- Improve geographic and socioeconomic diversity of reviewer pools by setting recruitment targets based on reviewer data from Action #1, and data from targeted field engagement activities described above.

Long-term outcomes:

- Changes in the following reflecting the three dimensions of equity:
  - o Increase in the number of applications from organizations serving communities;
  - o Improvement of review scores for applications from organizations serving communities;
  - o Increase in the number of awards to organizations serving communities; and
- Continued improvement reflected in the data collected as part of Action #1 above.

### **D. Accountability**

IMLS will:

- Write performance targets applying an equity breakdown of our agency work (e.g., institutions reached through our grantmaking or technical assistance) and report on our accomplishments and any amplification that result from our ongoing equity assessment work in our Annual Performance Reports (APR);
- Report to the National Museum and Library Services Board, IMLS's national advisory board.

For the non-applicant study:

- Set internal application goals over a five-year period for reaching underrepresented non-applicant institutions and underserved populations and communities that align with other equity initiatives; and
- Seek to conduct a follow-up evaluation in the fourth year to assess the efficacy of implementation.

### Action #3: Diversifying the Museum and Library Professions

#### A. Barrier to Equitable Outcome(s)

Approximately 12.9% of respondents to a [2017 American Library Association \(ALA\) Demographic Study](#) of its members self-identified as a racial or ethnic minority. According to [Bureau of Labor Statistics data](#), 9.5% of librarians self-identified as Black or African American, 9.9% as Hispanic or Latino (of any race), and 3.5% as Asian-American or Pacific Islander in 2020. A [demographic survey of art museums](#) found that racial and ethnic minorities comprised approximately 26% of art museum staff in 2018. Representation of racial and ethnic minorities remained low in leadership and knowledge roles in these museums, as it does in libraries. Geographic disparities also exist within these sectors. The highest concentration of library and information science positions exist in and around urban centers. Underserved and underrepresented communities, potentially including rural, tribal, and less densely populated geographies, likely do not proportionately benefit from the expertise of museum or library professionals due to a lack of qualified or experienced staff in the area. Racial/ethnic and geographic dimensions of equity intersect with socioeconomic and class disparities within the sectors. Museum and library work has historically been the purview of the middle class due to access to credentialing and acquired experience in the sectors. This can also adversely impact these communities' access to IMLS funding as untrained staff may be unaware that such funding is available, and/or lack the subject matter expertise or grant writing skill to pursue funding opportunities.

In tandem, certain data suggest these disparities have historically impacted and continue to impact the full participation of members of BIPOC groups, individuals in rural communities, and those living in poverty. Museums and libraries have recognized the need to close these representation gaps in order to have greater impact on the historically underrepresented and underserved communities they serve. An [evaluation](#) (and attendant [appendices with data](#)) of the IMLS Laura Bush 21<sup>st</sup> Century Librarian grant program published in 2013 by IFC International stated that the demographics of the library and information science profession was not keeping pace with the changing demographics of the United States. There are many factors contributing to this issue, but chief among them is the lack of representation in the museum and library professional pipelines, and subsequently the professional career ladders.

#### B. Action and Intended Impact on Barrier

IMLS will design and implement an externally facing internship program for the museum and library fields nationwide and across disciplines. This program will address the professional pipeline issues that contribute to inequity and lack of representation for historically underserved and underrepresented groups in the museums and libraries fields. Through its grant programs and in collaboration with sector partners, IMLS has previously funded pipeline projects ranging from high school internship opportunities to leadership development institutes for professionals. While these efforts have been successful, achieving a broader impact has been challenging due to the limited scope of these projects. Expanding the museum and library professional pipelines for broader, equity-centered impact requires a focused effort. Based on the analysis of the gaps identified and as-yet-identified through the equity data collection articulated in Action #1 above, IMLS will design and implement an initiative dedicated to expanding the professional pipeline of the sectors. This initiative will span a range of professional opportunities that introduce young adults (high school and college students) to the professional fields staffing museum and library, lower barriers to entry into these professions,



and support early career and emerging leaders in these professions. A primary vehicle of this initiative will be paid internships, fellowships, and sponsorships that provide hands-on experience in the fields. IMLS will collaborate with Federal, and sector institutions to scale successful equity-driven models from the fields.

Internships, fellowships, and sponsorships have long been considered important for career exploration and advancement. For example, studies indicate that internships increase full-time employment opportunities for interns. Recent reports indicate that more than 40% of corporate internships are unpaid. Unpaid internships disproportionately disadvantage individuals from historically underserved and underrepresented groups who cannot bear the financial burden of an unpaid internship. A pipeline initiative, over the course of five years (beginning in FY 2023), with a primary emphasis on paid internships will significantly lower the barrier of entry and advancement targeting historically underrepresented and underserved individuals in the professions. Over time this initiative will assist in mitigating demographic gaps in the professions and will contribute to museums' and libraries' effectiveness in reaching and serving underrepresented communities.

### **C. Tracking Progress**

Near- to mid-term outcomes:

- Increase in the # of paid, equity-focused internship opportunities in museums and libraries;
- Effect changes in perceptions of underserved and underrepresented communities about the accessibility of museum and library careers among high school and college interns;
- Gains by underserved and underrepresented community intern participants in marketable skills and knowledge, including grant writing, grants management, and related skills and knowledge (entry and early career professionals); and
- Increased interest by underserved and underrepresented community member participants in the pursuit of management and leadership opportunities in the professional museums and libraries fields.

Long-term outcomes:

- Targeted intern participants complete professional degrees in museum- and library-related fields;
- Full-time employment of these interns in permanent professional museum and library positions;
- Effective proportional representation by these interns in the underserved communities their employer museums and libraries serve; and
- Advancement by these interns into museum and library management and leadership roles.

### **D. Accountability**

IMLS will:

- Report on progress in its Annual Performance Report and to National Museum and Library Services Board, IMLS's national advisory board; and
- Engage an external evaluator to complete formative and summative evaluations of the equity-focused internship initiative to be published and disseminated to the fields.

## **Action #4: Equity and Civil Rights: Resource Center Infrastructure, Engagement Officer, and Capacity-Building (Outreach, Training, and Support)**

### **A. Barrier to Equitable Outcome(s)**

IMLS has historically understood that, as a Federal grantmaking institution for libraries and museums, it has long faced a capacity gap to provide a systemic framework that fully informs, equips, trains, and otherwise supports grantees to properly fulfill the wide range of Civil Rights– and equity-related obligations, responsibilities, and initiative opportunities they may have.

As a micro-agency with grantmaking responsibilities, IMLS primarily has devoted its limited Civil Rights resources to engagement with and technical assistance to our largest grant recipients, the State Library Administrative Agencies. Additionally, IMLS has funded technical assistance publications, as well as individual projects by institutions and associations.

That said, IMLS is committed to serving more effectively, within its equity and Civil Rights initiatives, the 140,000 unique institutions that make up the agency’s library and museum stakeholders. The equity and Civil Rights initiatives IMLS proposes here reflect our stakeholders’ need for curation—drawing together equity and Civil Rights resources to establish a sustainable, institutional framework and infrastructure.

IMLS continues to lack the resources and staffing necessary to construct the virtual resource framework and furnish the training and outreach required to properly equip grantees to identify and address the broad array of equity- and Civil Rights–related issues they encounter. Grantees require the tools (e.g., best practices, program development, and community engagement models) and resources necessary to, on the one hand, capably identify and undertake equity-related initiatives and, on the other, competently address Civil Rights enforcement issues that may arise. (Examples of compliance issues range from possible accessibility issues that may inhibit members of the public from fully enjoying grantees’ resources and services to potential complaints of discrimination that grantees may face concerning aspects of their operations.)

### **B. Action and Intended Impact on Barrier**

IMLS proposes taking various actions that properly leverage its Federal grantmaking role to furnish a robust institutional resource structure that facilitates Civil Rights and equity-related outreach, program development, and compliance. IMLS emphasizes the term “institutional resource structure” to reinforce its core priority: to curate mindfully and preserve this bundle of equity and Civil Rights initiatives within the IMLS infrastructure to ensure their longevity. The essential catalyst for these action steps is the additional funding for IMLS to establish a permanent agency FTE Equity and Civil Rights Engagement Officer staff position devoted to fulfilling the following action steps:

Step #1: Develop and launch a virtual Equity and Civil Rights Resource Center located on the IMLS website, which provides: Civil Rights Enforcement Training and Civil Rights Compliance Best Practices and Support (comprehensively addressing discrimination and accessibility programming),; as well as equity-focused best practices and proactive engagement initiatives across IMLS programs fostering and enhancing potential grantee capacity to approach community engagement and program development efforts with a robust Equity and Civil Rights lens.

Step #2: Develop Outreach and Technical Assistance Partnering and Support Programming whereby the Equity and Civil Rights Engagement Officer convenes in-person and virtual outreach, listening session town halls, as well as workshops and trainings presenting best practice tools, technical assistance, and model initiatives (cooperative agreements and granting). IMLS envisions this outreach as also including grantee pipeline development initiatives, translation services support, and cyclical grant awards monitoring as a means of measuring success and gathering evidence of additional best practice models furthering equity and Civil Rights priorities.

### **C. Tracking Progress**

Short- and long-term success and effectiveness at eliminating barriers may be measured straightforwardly by answering the following: Has the Equity and Civil Rights Resource Center Infrastructure been adequately and effectively built and updated? Does IMLS have an Equity and Civil Rights Engagement Officer serving the necessary functions of properly maintaining and supplementing the Resource Center infrastructure, as well as providing the requisite Equity and Civil Rights Outreach, Training, and Support to potential grantees?

Deeper questions about the Resource Center's and Outreach Programs' success measures may be posed and answered by (1) grantmaking and cooperative agreement initiatives developed as a result and (2) grantees' competencies identifying and addressing the broad range of Civil Rights compliance issues.

### **D. Accountability**

The Resource Center content development, as well as the actual Training Programs, Convenings, Support, and Outreach serve as straightforward measures of the accountability IMLS assumes for this bundle of proposed Equity and Civil Rights initiatives.

## Action #5: Contracting and Procurement

### A. Barrier to Equitable Outcome(s)

Barrier #1: Specialized Work: Many of IMLS's larger contracts (ranging from \$150K to \$3M) are for **very specialized types of work** (statistical research in libraries/museums) and it is very difficult to find diverse types of businesses that perform these functions. For example, our research and evaluation work requires a lead statistician having not only five years of experience in Federal statistical collections but also specialized focus in the library/museum sector. The unique statistical standards required for Federal sector work pose an eligibility challenge for many potential Offerors, perhaps especially for underrepresented businesses.

Evidence of this barrier lies in historically low levels of competition for research/evaluation contracts: from FY 2017 to FY 2021, IMLS averaged only 2.1 proposals for its 19 competitive actions, despite soliciting 9 potential Offerors, on average. Only two competitive actions yielded a small business response, and neither received an award.

Barrier #2: Limited Window for Offeror Response: Contracts posted at the end of the fiscal year (and on a restricted timetable) typically have received fewer viable proposals from many businesses. **Businesses, particularly underrepresented businesses, may not have sufficient time to respond to acquisitions.** In both FY 2020 and FY 2021, we received a 50% greater response for procurements where we provided potential Offerors with at least 30 days to submit a proposal, compared to less than 30 days. Further, competitive procurements prior to July received one extra proposal on average.

Barrier #3: SDVOSB and HUBZone Awards: Our larger and broader contracts for IT and administrative services afford greater flexibility for making contracts with small businesses than do our more specialized contracts. For these IT and administrative service contracts, IMLS used direct contracting programs for Small Disadvantaged Businesses (SDBs) and Woman-Owned Small Businesses (WOSBs) with great success, far exceeding our targets. However, such a direct contracting program does not exist for Service-Disabled Veteran-Owned Small Businesses (SDVOSB) and Historically Underutilized Business Zone (HUBZone) Small Businesses. Performing the market research necessary to locate those specific categories of businesses and target them for an acquisition requires a drastically increased amount of time, both from staff and in the overall procurement process.

### B. Action and Intended Impact on Barrier

#### Barrier #1: Specialized Work

Lack of competition increases acquisitions costs and negatively affects our ability to target underrepresented businesses. For contracts involving specialized areas where certain types of small businesses are less competitive, IMLS intends to:

- Include an evaluation factor and requirement to subcontract to those classifications of businesses; and
- Broaden and increase virtual industry day events for these specialized research and evaluation projects in order to seek new businesses that may meet agency needs and maximize underrepresented business participation.

Both a subcontract evaluation factor and additional targeted industry day provide measurable and reportable metrics for how well the agency targeted underrepresented businesses, enabling us to better understand barriers.

#### Barrier #2: Limited Window for Offeror Response

IMLS intends to start the procurement process earlier for acquisitions that could be targeted for these groups. Starting earlier will allow IMLS to increase its window for proposals from 15 to 30 days, allowing more time for more competitive offers and for negotiating the best terms with the selected Offeror.

#### Barrier #3: SDVOSB and HUBZone Awards

In the past five years, IMLS met its annual target once (for SDVOSBs) and twice (for HUBZone small businesses). IMLS intends to seek additional resources to expand its market research and acquisition process to target SDVOSB and HUBZone businesses. Market research may allow us to identify these potential businesses and develop contract opportunities such businesses may be better able to pursue. Additional support may allow the agency to respond to the administrative contracting requirements for these specific underrepresented businesses in a more streamlined manner similar to the efficient direct award programs that exist for WOSBs and SDBs.

### **C. Tracking Progress**

#### Barrier #1: Specialized Work

- Factor(s): Track responses to solicitations: are large businesses including subcontracts to these underrepresented businesses; are there any adverse impacts with fewer offers received, higher prices, or lower quality in proposals?
- Long-term Success: IMLS removes these barriers, as well as related adverse impacts, and increases its subcontracts to underrepresented businesses.

#### Barrier #2: Limited Window for Offeror Response

- Factor: Track the dates when the agency initiates contract requests, as well as the makeup of the Offerors: Does an earlier initiation date result in a greater number of underrepresented businesses submitting proposals?
- Long-term Success: All IMLS procurement processes allow for a wider variety of Offerors to submit viable proposals.

#### Barrier #3: SDVOSB and HUBZone Awards

- Factor(s): Track Awardees' business classifications; identify gaps in Awardees versus targeted underrepresented businesses on a quarterly basis.
- Success: IMLS meets its goals for the number of contract awards to these underrepresented businesses.

### **D. Accountability**

IMLS will continue to internally track statistics for solicitations from and contracts made to underrepresented businesses and publicly report on these statistics in our Annual Performance Report. Additionally, as we prepare our performance targets for each fiscal year, we will include targets for monitoring and maintaining our performance in these areas.