Institute of Museum and Library Services (IMLS)
Library Services and Technology Act (LSTA) Grants to States Program
Trends Analysis Study

Supporting Statement A

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating the collection of information.**

In 2003, Congress reauthorized the Museum and Library Services Act (P.L. 108-81), reaffirming the vital roles that museums and libraries play in our communities. The Institute of Museum and Library Services (IMLS) statutory mission includes strengthening museum and library services to the public, including conducting analyses of museum and library services that shall identify national needs for, and trends of, museum and library services provided with IMLS funds, report on the impact and effectiveness of such services, and identify and disseminate information on the best practices of programs that provide such services.

One of the programs that IMLS administers is the Library Services and Technology Act (LSTA) Grants to States, an annual, formula-based federal funding program that began in 1956 as the Library Services Act. The LSTA Grants to States program supports library services in every state and now serves the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of Northern Mariana Islands. These grants to State Library Administrative Agencies (SLAAs) are the single largest source of federal funding for the nation's libraries.

Each state receives a baseline award and additional population-based funds. From 2002 to 2006 IMLS distributed nearly $800 million in federal grants to the states and territories. In 2007 individual grants ranged from $820,240 to $16,506,165, providing between 5.4% and 49.4% of each SLAA's budget for statewide library service. The formula includes matching and "maintenance of effort" provisions intended as a catalyst for library support from other sources.

One strength of the program is that each SLAA identifies the priorities and the eligibility specific to the needs of their states, within the broad scope of the priorities of the authorizing legislation. IMLS is aware that the context within which library services are provided in each state varies significantly. However, little is known regarding the way in which an individual state's context affects the ways in which the state utilizes its LSTA Grants to States allotments. Gaining a better understanding of how the library service environment in individual states impacts decisions regarding LSTA Grants to States funding will enable IMLS to enhance its administration of the program and will help SLAAs by providing comparative information they can use to enhance their implementation of the Grants to States program.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for new collection, indicate the actual use the agency has made of the information received from the current collection.**

   The information will be collected and analyzed by Himmel & Wilson, Library Consultants under contract to IMLS. Himmel & Wilson was selected in December 2007 to conduct a comprehensive trends analysis of the Library Grants to States program from 2002 to 2006. While much of the data and information needed to complete the trends analysis is available through existing documents, an expert committee established to advise the consultants and to review their work product identified one significant area in which information is either not available and/or is incomplete. The committee, which includes 3 of the 52 state library administrative agency heads that are the subjects of the data collection, is of the opinion that the collection of information on the state-level context within which LSTA Grants to States funds are expended is of vital interest both to IMLS in its role in administering the program and to the SLAAs.

   The information collected will help the SLAAs understand the trends that will be identified in this study and to consider adopting and/or adapting best practices employed by other states. The information collected will be useful to IMLS to administer the grants to states program in a manner that is fair and responsive to the states while, at the same time, maintaining full compliance with its statutory responsibilities.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

   Although the use of a web survey to collect the needed information was considered, the qualitative nature of the information to be gathered lends itself to a short telephone interview. Our assessment of the situation, which is based in part on the opinions of the three state library administrative agency heads on the expert committee, is that a short telephone interview will actually be less burdensome on the subjects than an electronic survey. Furthermore, we anticipate that the telephone survey will garner a higher response rate than the web survey would achieve.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2.**

The consultants retained to carry out the larger trends analysis have conducted a literature search and have examined existing data sources available through IMLS, the National Center for Education Statistics, and the American Library Association. Several sources including five-year plans and "state program reports" submitted by the states to IMLS contain some of the needed context information. Most of the data was previously collected in an OMB-approved report (3137-0029). The consultants have also reviewed the publication entitled ***Library Statistics Program: State Library Agency Report for FY 2006,*** which contains the largest amount of information relevant to the data collection effort.

Based on the literature review and examination of other available documents, the interview questions have been formulated to avoid burdening subjects with questions seeking answers that are readily available from the other sources. Additionally, because this study is a one-time collection of qualitative data, the intent of the study is to bring the prevailing trends of the Grants to States program into context.

5. If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

No small businesses or small entities are included in the targeted population.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This information collection effort is designed to be a one-time event specifically related to the 2002 – 2006 trends analysis. If the information is not collected, the analysis will lack accurate perspective on which to base a fair assessment of state-level decisions that have been made in allocating LSTA Grants to States funds.

7. Explain any special circumstances that require the collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it was institute procedures to protect the information's confidentiality to the extent permitted by law.**

Not applicable. There are no special circumstances.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5DFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years – even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.**

   The Federal Register notice for this research was published on **March 3, 2008 (Volume 73, Number 42) on pages 11446-11447**.

   One public comment was received in response to the Federal Register notice. The comment remarks on the overspending at the Smithsonian Museums and questions why this study does not include the Smithsonian as part of the sample. The study presented here focuses strictly on the Grants to States program at IMLS, and is intended to evaluate the effectiveness of the grants award to state libraries, not museums or other institutions. Therefore the comment cannot be addressed by IMLS because it does not relate to this study.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contracts or grantees.**

   Not applicable. No payments or gifts will be provided.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

    Neither IMLS nor the contractor (Himmel & Wilson, Library Consultants) will identify individual respondents' data outside the agency, and will discuss them within the agency only as necessary to ensure thorough, accurate understanding of the data. IMLS will not release information about the responses of individuals without obtaining respondents' permission. Respondents will be informed about these protections. Direct quotes and responses may be reported; however, no identifying information will accompany the report unless respondent permission is obtained.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

    No questions of a personal or sensitive nature will be asked.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**
    - **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
    - **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item13 of OMB Form 83-I.**
    - **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

    IMLS estimates the following burden for collection of this information. The burden was estimated using the median hourly rate for a state librarian as cited in the COSLA (Chief

Officers of State Library Agencies) Salary Survey published in April 2007. The contractors are piloting the interview with 3 respondents, drawn from the respondent pool.

<u>Case Studies, phone interviews</u>

We anticipate a 100% response rate from 52 participants.

Number of state librarians expected to respond to phone interview: 52 (one from each state, plus D.C. and Puerto Rico)

Estimated response time: 0.5 hours x 52 = 26 hours

Estimated cost/respondent: 0.5 x $45.82 = $22.91

Estimated total burden: 0.5 hours x 52 x $45.82 = $ 1191.32

Annualized cost to respondents for the one-time, half hour burden is estimated at $1191.32.

13. **Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).**

    Not applicable.

14. **Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred with the collection of information. Agencies may also aggregate cost estimates from paragraphs 12, 13, and 14 in a single table.**

    The total estimated cost to the Federal government is a one-time expenditure of $216,550.00. The data collection is 15% of the project with an estimated cost of $32,482.50.

15. **Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.**

    Not applicable

16. **For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

No complex analytical techniques will be used. Standard procedures for the analyses of interviews including thematic analysis will be employed. IMLS expects to complete the project by September 2008. IMLS intends to publish the findings once they are completed in September 2008.

Proposed Timeline for the LSTA Trends Analysis Study:

Task No.	**IMLS**	**Contractor**	**Estimated Period of Effort**	**Approximate Timetable/ Completion Date**
	Awards contract for the analysis of Grants to States for library services in 2002-2007			November 26, 2007
	Identifies provisional participants in project Action Committee			November 26, 2007
1	Validates participants of project Action Committee with contractor	Holds initial in-person meeting with IMLS staff at IMLS	1 week	December 3, 2007
	Invites participants of project Action Committee			December 5, 2007
2		Drafts detailed work plan	1 week	Draft detailed work plan due December 10, 2007
3		Convenes project Action Committee to validate focus, goals, and methods for in-person meeting, at IMLS	1 week	December 20, 2007
4		Revises work plan as necessary and submits revised plan to IMLS	1 week	Revised detailed work plan due December 28, 2007
	Authorizes detailed work plan		1 week	January 4, 2008
5		Conducts literature and document review; gathers, reviews, analyzes relevant data from existing sources	16 weeks (approximate)	December 4, 2007 – April 25, 2008
6		Develops and pilots methodology and instruments (if new data collection is required) and drafts OMB clearance statements	4 weeks	January 4 – February 4, 2008
	Obtains OMB clearance		17 weeks (120 days)	January 4 – May 9, 2008
7		Drafts overview and highlights of findings for	2 weeks	April 25 – May 9, 2008

		preliminary report to field; submits draft to IMLS for discussion		Draft due May 9, 2008
8		Reviews provisional findings with IMLS staff (may be in-person, phone, or Web-mediated meeting) and revises draft	1 week	Revised draft due May 16, 2008
9		Convenes Action Committee and IMLS staff for in-person meeting at IMLS for presentation and review of preliminary findings and questions		May 15, 2008 (approximate)
10		Collects original data (if required)	4 weeks	May 9 – June 6, 2008
11		Revises overview and highlights of findings	2 weeks	Revised overview and highlights due June 2
12		Performs preliminary analysis of new data (if collected) and develops draft outline for final report	3 weeks	June 6 – July 7, 2008
13		Delivers draft outline for final report and preliminary interpretation of any new data collection to IMLS for discussion		Drafts due July 14, 2008
14		Revises draft outline for final report as necessary	1 week	Revised outline due July 21, 2008
	IMLS authorizes report outline			July 25, 2008
15		Delivers draft final report	3 weeks 2008	August 15, 2008
16		Reviews draft report with IMLS staff (may be in-person, phone, or Web-mediated meeting) and revises draft as needed	1 week	Revised draft analysis due August 22, 2008
17		Convenes Action Committee and IMLS staff, summarizes all findings including new data analysis, and facilitates		August 29, 2008

		discussion (can be in-person, phone or Web-mediated meeting)		
19		Incorporates recommendations of Action Committee; delivers final report of findings from document review and analysis of existing data and original data collection	3 weeks	September 22, 2008
20	IMLS publishes findings from final report on its website and via eNewsletter *Primary Source*		3-4 weeks	October 20, 2008

17. If seeking the approval to not display the expiration date for OMB approval of the information, explain the reasons that display would be inappropriate.

Not Applicable. The expiration date will be displayed.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I).

Not applicable. No exceptions are identified in Item 19 of OMB Form 83-I