

Section A. Justification

A.1. Necessity of the Information Collection

The State Library Agencies (StLA) survey is a cooperative effort of the Institute of Museum and Library Services (IMLS), the Chief Officers of State Library Agencies (COSLA), and the U.S. Census Bureau (the data collection agent for IMLS). The survey was developed based on the recommendation of COSLA in April 1992. The State Library Agencies Survey Steering Committee was established in November 1992 to provide continuing guidance in the design and conduct of the survey and included representatives from State library agencies, the American Library Association (ALA), the former National Commission on Libraries and Information Science (NCLIS), IMLS, and Census. In December 2008, IMLS combined the StLA Survey Steering Committee and the Public Libraries Survey (PLS) Steering Committee into one advisory group named the Library Statistics Working Group (LSWG). The Working Group serves the same function as the former steering committees and includes five members of COSLA, five State data coordinators and 5 members who represent relevant library associations, data users, and members of the research community. The StLA Survey is administered annually because the COSLA Financial Survey of State Library Agencies, which it replaces, was conducted annually, and due to the importance of these data to StLAs and to State and federal policymakers.

The StLA Survey collects descriptive data about StLAs, including information on their governance; allied operations; direct library services to the public; services to libraries and library cooperatives; electronic services and resources; service outlets; public service hours; collections; service and development transactions; staff revenue and expenditures. These data, when added to the data collected by the IMLS surveys of public, academic, and school libraries, help to complete the national picture of library service.

StLAs are the official agency of a State charged by State law with the extension and development of public library services throughout the State (20 U.S.C. Chapter 72, 20 U.S.C. § 9122). StLAs are the governmental entity responsible for the administration and supervision of Library Services and Technology Act (LSTA) funds. StLAs also administer the State library operations, allied operations (such as State archives, State legislative reference organizations, and State records management services), libraries for the blind and physically handicapped, and the State Center for the Book. They provide important reference and information services to State governments and may also function as the State's *public library at large*, providing library services to the general public. The statewide services provided by StLAs to libraries and library cooperatives are not reported elsewhere. StLA services provided to State government are not presently covered in any other data collection.

Without data on StLAs, the IMLS educational data systems are incomplete as libraries are a central and vital component of the education infrastructure. StLAs play a leadership role in assisting public libraries to respond to Department of Education goals and State education reform initiatives.

Congressional Authorization

20 U.S.C. Chapter 72, 20 U.S.C. §9108 (analysis of impact of museum and library services) authorizes the information collection:

- “... the [IMLS] Director shall carry out and publish analyses of the impact of... library services. Such analyses—
- (1) shall be conducted in ongoing consultation with—
 - (A) State library administrative agencies;
 - (B) State, regional, and national library...organizations; and
 - (C) other relevant agencies and organizations;

- (2) shall identify national needs for, and trends of...library services provided with funds made available under this chapter;
- (3) shall report on the impact and effectiveness of programs conducted with funds made available by the Institute in addressing such needs; and
- (4) shall identify, and disseminate information on, the best practices of such programs to the agencies and entities described in paragraph (1)."

IMLS library survey activities will be designed to address high-priority library data needs; provide consistent, reliable, complete, and accurate indicators of the status and trends of State and public libraries; and report timely, useful, and high-quality data to the U.S. Congress, the States, other education policymakers, practitioners, data users, and the general public.

A.2. Purposes and Uses of the Data

The purpose of the StLA Survey is to provide State and federal policymakers and other interested users with information about State library agencies. The data collected are useful to (1) chief officers of StLAs, (2) policymakers in the executive and legislative branches of Federal and State governments, (3) government and library administrators at Federal, State, and local levels, (4) the American Library Association and its members or customers, and (5) library and public policy researchers.

Federal and State officials will use these data in planning, as they make policy decisions about legislation, appropriations, and resource allocation and monitor federal and State grant programs for public libraries and other libraries in the State. IMLS and other federal agencies will use the data to help shape their recommendations regarding State libraries and public library service. StLAs will use the data for State, regional, and national comparisons of library services and resources to determine the level of StLA operations in agencies of similar size and characteristics, and to plan for the effective use of funds.

The public library components of the StLA survey, when added to the data collected by the IMLS Public Libraries Survey, help complete the national picture of public library service. The StLA Survey is the only survey that collects the State library services to public libraries. The data cannot be collected through the Public Library Survey, as the data reported on that survey reflect services and resources directly administered by local public libraries. Therefore, in order to provide basic descriptive data on public library service nationally, StLAs need to be surveyed. National, State, regional, and local professional library associations need current, *comprehensive* public library data to develop informed policy positions on State libraries regarding their public library services and library development activities.

Researchers need these data to develop a broad picture of State library services to and funding of libraries and library cooperatives. Journalists and educators can use these data to determine the role of StLAs in the provision of statewide services to libraries and library cooperatives, and their contribution to the education infrastructure of the nation.

Some examples where data from the survey has been used:

The State Library Agency Survey provides IMLS with data to monitor the financial and service capacity of the State Library Agencies and to analyze changes in these characteristics over time. Data elements in the survey have been used for annualized state-by-state reports (see State Library Agencies reports FY94-FY08 at <http://harvester.census.gov/imls/pubs/stla/index.asp>) and more recently, for more detailed analysis of trends (see State Library Agency Service Trends: 1999–2008 at http://www.imls.gov/pdf/Brief2010_02.pdf).

Monitoring the fiscal and service conditions of these organizations is an important function for IMLS, which administers the [Grants to State Library Administrative Agencies](#) program. This program provides funds to State Library Administrative Agencies (SLAAs) using a population-based formula. SLAAs may use federal funds to support statewide initiatives and services; they also may distribute the funds through subgrant competitions or cooperative agreements to public, academic, research, school, and special libraries in their state. The survey also provides information necessary for State Library Administrative Agencies to benchmark their financial characteristics and services against those in other states. In addition serving as the key administrative agencies for Library Services and Technology Act grant in their respective states, SLAAs are also important to the delivery of federal programs outside of IMLS, such as Broadband Technology Opportunities Program, the Rural Utility Service and E-rate.

A.3. Use of Information Technology

The StLA data are collected over the Internet via a web-based reporting system. The web application includes a user guide and tutorial explaining how the application functions, the survey instrument, a 'Help' function that quickly links data items to their definitions, and an edit check tool. The web survey was designed to minimize response burden, to improve the timeliness and quality of the data, and to require minimal or no edit follow-up for data problems.

To reduce response burden, the survey is transmitted with pre-entered prior-year data for items where the data are not expected to change annually—most of Parts A through F and M, which is 62 percent of the survey items. The respondent is instructed to review the pre-entered data and update any information that has changed from the previous year. All other data cells are left blank for the respondent to fill in, not update. The web edit check tool alerts the respondent to questionable data during the data entry process (via on-screen "edit check warnings") and through edit check reports that can be viewed on-screen or printed. The edit check program enables the respondent to submit an edited data file to IMLS that usually requires little or no follow-up for data problems.

The final survey database and report are released on the IMLS website. A print copy of the survey report is provided to chief officers of State library agencies, survey respondents and the LSWG.

A.4. Efforts to Identify Duplication

There continues to be no duplication of effort between by IMLS for the StLA Survey and IMLS LSTA reporting in the collection of LSTA data from StLAs.

As indicated previously, the LSWG provides continuing input in the design and conduct of the survey and includes representatives from State library agencies, the American Library Association, IMLS and Census. The LSWG is aware of the need to identify and avoid duplication of effort. A search has been made to identify other efforts that might duplicate this data collection effort. IMLS finds that there is no other universe file available and no other effort duplicates the descriptive data collected by the StLA Survey.

The Institute of Museum and Library Services (IMLS) administers the LSTA program. IMLS distributes the LSTA funds to StLAs, which are required by law to administer the funds and submit annual performance reports to IMLS describing LSTA grant activity. IMLS maintains State files of these reports and develops summary data for the Performance and Accountability Report provided to Congress.

The StLA Survey collects some LSTA data; however, the data are not directly comparable to the data requested in the IMLS annual State program report. On the StLA survey, all data (including federal funds) are reported on the basis of the State fiscal year, for comparability and meaningful analysis. In contrast, due to specific grant requirements and deadlines incorporated into the grant-making effort, States submit interim and final financial reports to IMLS covering grant

activity for different reporting periods (i.e., the funding grant period or fiscal year period). States report federal LSTA data to IMLS on a federal fiscal year basis (October 1 to September 30), and State data on a State fiscal year basis (usually July 1 to June 30). This difference would not be acceptable for an Federal agency with statistical programs such as IMLS, which needs comparable data for meaningful analysis.

IMLS collects LSTA data at the level of the *individual sub-grant*. The reported data are highly detailed, and the items differ from those collected on the StLA Survey. For example, IMLS collects data on the number of LSTA grants funded, the number of eligible applicants and applications, and the amount awarded. In contrast, the StLA Survey (Part H) collects data on the *aggregate* number of LSTA and State grants awarded. The StLA Survey (Part J) requests total LSTA State Program funds drawn down from the federal government during the State fiscal year covered by the survey, excluding carryover. IMLS requires that States report funds “available” for the federal fiscal year, including carryover. It would also not be feasible for States to report LSTA allocations received from IMLS as revenue on the StLA Survey since many States, by law, cannot report their allotments as revenue until they expend the funds. Part L of the StLA Survey requests total LSTA State Program expenditures during the State fiscal year covered by the survey, by type and use of expenditure. The expenditure categories on the StLA Survey are not used by IMLS. LSTA expenditures reported to IMLS are defined as actual disbursement of federal dollars.

The StLA and IMLS data collections have fundamentally different purposes. The StLA Survey is conducted in fulfillment of IMLS’s duties as Federal agencies with statistical programs to collect, collate, analyze, and report full and complete statistics on the condition of education in the United States. The survey provides a descriptive database of StLAs for this purpose.

In summary, the LSTA data collected by the IMLS StLA Survey and IMLS LSTA reporting forms differ in level of detail, reporting requirements, and reporting purposes.

A.5. Methods Used to Minimize Burden on Small Businesses

Not applicable.

A.6. Consequences of Less Frequent Data Collection

Chief officers of StLAs need these data on an annual basis for program planning and budget-setting. The Chief Officer of State Libraries Association (COSLA) also wishes to continue their historical time series of data on StLAs, begun with the COSLA survey, through the StLA survey. The high value that State library agencies place on the survey is evidenced by the 100 percent response rate to this survey since its inception in 1994.

One of the primary purposes of the StLA survey is to help complete the national picture of public library service. This goal is best achieved by conducting all surveys that collect public library data on the same frequency. The Public Libraries Survey has been conducted annually since its inception in 1989. NCES conducted the survey until October 2007 when IMLS began its oversight. Annual data are more current and thus more valuable for planning and analysis than data collected on a less frequent schedule.

It usually takes several years for libraries to develop administrative records systems and to staff the library statistics specialty. Changes in survey periodicity may be disruptive (for example, the record systems may be allowed to degrade and trained staff may be reassigned) to library operations and may jeopardize future data collection capabilities and data quality.

These concerns have been repeatedly and forcefully expressed to IMLS by the Chief Officers of State Library Agencies (COSLA) and the IMLS LSWG, who urge the continued annual conduct of the StLA Survey.

A.7. Special Circumstances

The data will be collected according to the paperwork reduction guidelines in 5 CFR 1320.5.

A.8. Consultations Outside the Agency

The LSWG is consulted in the design and conduct of the StLA survey. The Working Group includes staff of State library agencies (including chief officers and survey respondents), the ALA, IMLS and Census.

A.9. Payments or Gifts to Respondents.

There are no payments or gifts to respondents.

A.10. Assurance of Confidentiality.

Personal information collected through this survey will be kept private to the extent permitted by law.

A.11. Justification for Sensitive Questions

There are no sensitive questions on this survey.

A.12. Estimates of Hour Burden to Respondents

<u>Survey</u>	<u>Number of respondents</u>	<u>Estimated response time*</u>	<u>Total burden hours</u>
StLA	50 States and DC	26 hours	1,326 hours

*Time per response is based on FY 2009 survey results that ranged from 3 hours to 50 hours (averaging 26 hours).

The cost to survey respondents is estimated to be \$34,874. This estimate is derived using the standard IMLS procedure: multiplying the estimated reporting hours per respondent (26), by the average hourly compensation for a typical respondent (\$26.30 per hour, for the combined time of a State library survey respondent (key holder) and a technician), by the projected number of respondents (51).

A.13. Estimates of Cost Burden to Respondents

There are no costs beyond those specified under A.12.

A.14. Estimates of Cost to Federal Government

The total cost to the federal government for administering the FY 2010 StLA survey is estimated to be \$671,442. This includes salaries and expenses for IMLS (\$87,442) and Census (\$584,000 for this annual survey administered by Census under an Interagency Agreement between IMLS and Census.

A.15. Reason for Program Changes or Cost Adjustments

There are no costs beyond those mentioned under section A. 12.

A.16. Project Schedule

The StLA data products are released to the public on the IMLS website as soon as they are available. The StLA data products include (1) the final data file (in MS-Access and ASCII format) and (2) a report (in PDF format) containing selected findings from the survey and summary tables. A print copy of the report will be disseminated to chief officers of State library agencies, survey respondents and the LSWG.

The StLA data may be presented in descriptive, analytic, or technical reports, similar to other IMLS surveys. These reports may cover policy issues or other issues of interest to the library community, State and federal officials, and the general public.

The FY2010 StLA Survey has the following general schedule:

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| 1. Survey mail-out | October 13, 2010 |
| 2. Survey due date | February 16, 2011 |
| 3. Edit follow-up begins | Upon survey receipt (on flow basis) |
| 4. StLA Survey data files released | August 2011 |
| 5. StLA Survey report | November 2011 |

A.17. Request to Not Display Expiration Date

The expiration date will be displayed at the top of the web survey instrument.

A.18. Exceptions to the Certification

There are no exceptions.