Preface

The Institute of Museum and Library Services (IMLS) requests clearance for the collection of the Public Libraries Survey (PLS), FY 2011, FY 2012, and FY 2013 from the Office of Management and Budget (OMB). This survey was first implemented in 1989 by the National Center for Education Statistics (NCES) to collect library statistics for all public libraries in the 50 States, the District of Columbia, and the outlying areas. This clearance requests permission to collect the same data that OMB approved IMLS to collect for FY 2008, FY 2009 and FY 2010 (3137-0074).

Section A. Justification

A.1. Necessity of the Information Collection

The Public Libraries Survey (PLS) is a cooperative effort of the Institute of Museum and Library Services (IMLS), the Census Bureau (the data collection agent for IMLS), and the Library Statistics Working Group (LSWG). In 1985, a pilot project was conducted in 15 States to assess the feasibility of a Federal-State cooperative program for the collection of public library data. The pilot project was funded by the National Center for Education Statistics (NCES) and the U.S. Department of Education's former Office of Library Programs (now a division of IMLS). The American Library Association (ALA) provided valuable guidance. In 1987, the project's final report recommended the development of a nationwide data collection system. The Hawkins-Stafford Elementary and Secondary School Improvement Amendments of 1988 (P.L. 100-297, 102 Stat. 130, 335 (1988)) charged NCES with developing a voluntary Federal-State Cooperative System (FSCS) for the annual collection of public library data. To carry out this mandate, in 1988, NCES formed a survey steering committee with the former National Commission on Libraries and Information Science (NCLIS), and representatives from State library agencies and ALA. In December 2008 IMLS combined the Public Libraries Survey (PLS) Steering Committee and the State Library Agency (StLA) 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, 5 members who represent relevant library associations, data users, and members of the research community, the ALA and Census.

The Public Libraries Survey (PLS), a voluntary survey, collects descriptive data on the universe of public libraries in the United States and the outlying areas through a network of State data coordinators located in the state library agencies. The PLS is considered a model of Federal-State cooperation. The survey has had a unit response rate of 96 percent or higher every year since its inception. The high response rate is an indication of states' interest in the data and their commitment to the survey.

These data provide current, national data on the status of approximately 9,200 public libraries and their public library service outlets. Public libraries fill important educational, informational, economic, cultural, and recreational needs. Reliable, valid, and timely public library statistics provide a basis for effective program evaluation and management and a tool for policy makers in determining the investment of public resources in public library development.

Congressional Authorization

IMLS will fulfill the congressional mandate in 20 U.S.C. sec. 9108 (Analysis of impact of museum and library services):

"From amounts described in sections 9123(c) and 9176(b) of this title [it is possible other funding sources will be provided], the Director shall carry out and publish analyses of the impact of museum and library services. Such analyses—

- "(1) shall be conducted in ongoing consultation with—
 - "(A) State library administrative agencies;
 - "(B) State, regional, and national library and museum organizations; and
 - "(C) other relevant agencies and organizations;
- "(2) shall identify national needs for, and trends of, museum and library services provided with funds made available under subchapters II and III of 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 PLS data collection is to provide State and Federal policymakers and other interested parties with information about public libraries in the U.S. The PLS is a national census of public libraries and their service outlets including descriptive data for each State and for each public library. The data allow comparisons among libraries of similar size on variables such as size of collection, total number of staff, and total operating expenditures. The *Compare Public Libraries* interactive tool, anticipated to be accessible through the IMLS web site, would facilitate these peer comparisons.

Federal, State, and local officials use these data as they make policy decisions about legislation, appropriations, and resource allocation. Public library statistics are needed, for example, to support periodic review of legislation such as the Library Services and Technology Act (LSTA) and the Telecommunications Act of 1996. Statistics are also needed to help shape recommendations of IMLS, the National Endowment for the Humanities (NEH), and other agencies interested in public libraries. These data are also used at the State and local levels to compare conditions in libraries of similar size.

National, State, regional, and local professional library associations need current, comprehensive public library data for developing informed policy positions on public libraries. In addition, the Chief Officers of State Library Agencies (COSLA) supports the development of a universe file for use in sample surveys on such topics as use of technology in libraries, public library participation in networks and cooperatives, access for persons with disabilities, and services to children and young adults.

Researchers need these data to analyze state of the art of public librarianship and to improve its practice. Private companies need reliable national statistics for developing business plans and marketing strategies within the library sector of the economy. These data are also useful to the private sector in planning moves or adding new business locations. Library services are important assets for employees and their families and for corporate operations. Journalists and educators use library statistics in describing the role of public libraries in American society.

A.3. Use of Information Technology

The PLS was the first national NCES data collection to be reported, edited, and tabulated completely electronically. In 1989, NCES developed personal computer software called DECTOP (Data Entry, Conversion, Table Output Program) for States to use in collecting and reporting their public library data to NCES. The software was converted to a Windows-based product in 1998 and renamed WinPLUS (Windows Public Library Universe System). WinPLUS was converted to a web-based reporting system (called WebPLUS) in FY 2005. The team responsible for the conversion the web-based system received Census' Bronze Medal Award "for innovation and effective customer satisfaction." "This Web-based survey reduces respondent burden, improves timeliness and increases data quality." The award is the highest honorary award Census gives.

The survey application allows direct data entry or the import of data from external files (e.g., Microsoft® Excel and Microsoft Access files). An edit check tool generates on-screen warnings during the data entry/import process, enabling the respondent to review the data and correct errors before submitting the final data to IMLS. An "historical tracking" feature performs universe maintenance based on the respondent's structural changes to the file, such as closing a library, adding a new library, merging libraries, and changing a library's name or address.

In addition to a report, data file and documentation, the data are used for two web survey products:

(1) Compare Public Libraries allows users to compare their library with a group of similar libraries, based on a number of library characteristics, such as total circulation or total expenditures.

(2) Search for Public Libraries allows users to review data for any public library in the nation.

A.4. Efforts to Identify Duplication

The PLS is the only known universe survey of public libraries in the United States. The LSWG provides continuing guidance in the design and administration of the survey and includes representatives from State library agencies, ALA, and the Census Bureau. The committee 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 surveys of public libraries, and no other effort that duplicates the data collection under the PLS.

In 1988, ALA's Public Library Association (PLA) developed the Public Library Data Service (PLDS), which is conducted annually. The PLDS survey, however, is different from the PLS in a number of important ways.

The 2010 PLDS annual survey collected data from 987 public libraries across the country and Canada, and is not a universe. Over 50 percent of the PLDS respondents represent public libraries serving populations of over 100,000, while almost 95 percent of U.S. public libraries serve populations less than 100,000. The PLS is a universe survey of approximately 9,200 public libraries in the U.S. and its outlying areas

The PLDS reports the raw data submitted by local public libraries. The PLS collects public library data through the State library agencies. The State library agencies edit the PLS data before submitting it to the Census Bureau for data processing, edit follow-up, and imputation.

The data elements from the two surveys are not comparable. While there is some overlap
of items, such as type of outlet, revenue, operating expenditures, and number of staff, the
PLDS also collects some data elements not collected under the PLS (e.g., number of
people registered at the library, library director's name and salary, beginning librarian's
salary, in-library use of materials, some holdings, filtered Internet access, fax information

delivery, e-mail reference service, annual electronic visits, and remote access of the Online Public Access Catalog (OPAC)).

The PLS collects many substantive items not collected under PLDS, including circulation
of children's materials; children's program attendance; collections for books and serials,
audio, video, and serial subscriptions; number of librarians with and without the ALA-MLS;
unduplicated population of legal service areas; and capital expenditures.

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

Not applicable.

A.6. Consequences of Less Frequent Data Collection

Annual data are more current and thus more valuable for planning and analysis than data collected on a less frequent schedule. Congress, public libraries, State library agencies, researchers, and others use the data to assess the condition of public libraries. Although the PLS data comprise part of the data most State library agencies have historically collected from their local public libraries, up-to-date national and State summaries of standardized data would not be available if IMLS did not conduct this annual survey.

The State library agencies (the data providers), the Census Bureau, and IMLS urge continuation of the PLS on an annual cycle, based on the high demand for these data by the library community. The high value that State library agencies place on the survey is evidenced by the overall response rate by local public libraries of at least 96 percent every year since the survey's inception.

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

Respondents to the PLS are not offered nor do they receive pay or gifts for their participation in the PLS.

Eligible State data coordinators receive the Francis Keppel Award (an abacus for first time winners and a small plaque with the collection year for subsequent years) for timely and accurate submission of their State data. The award is based on a point system covering important aspects of the original submission and post-submission processing.

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

The PLS collects staff salaries and employee benefits information, and these data are potentially sensitive for the many small public libraries in the nation, although they might be considered

public information in their communities. These data are a significant portion of a public library's operating expenses and cannot be omitted from a data collection whose purpose is to provide basic descriptive information on public libraries. However, the collection and dissemination of data will be conducted in accordance with applicable law, with attention paid to potentially sensitive information. (see also section A.10 above).

A. 12. Estimates of Hour Burden to Respondents

The PLS data are usually only part of the data that State library agencies collect on their surveys of local public libraries. The PLS data are extracted from the State surveys by the State data coordinators and reported to IMLS on the web survey application (WebPLUS).

<u>Survey</u>	Number of respondents	Estimated response time*	<u>Total</u>
burden	<u>hours</u>		
PLS	55 (50 States, DC, and 4 outlying areas)	85.7 hours	4541 hours

The annual time burden estimate was calculated as the sum of the hours reported by on the certification form that the State Data Coordinators completed when they submit their data. However, there is a great deal of variability in this response from state to state. IMLS suspects the reasons for this have to do with the fact that the question was not collected through the web-based tool and did not include accompanying documentation and definitions like other questions in the survey. Starting in FY11 this question will be included in the online tool and will include clarifying definitions for the data providers. IMLS anticipates that this change will result in more reliable estimates in the coming years.

The PLS is basically the same as it was when it moved over to IMLS. The change in this submission is attributable to changes in the methodology for calculating burden and, to some degree, the lack of reliability in the responses to this item. There are many new SDCs that were not around when the PLS was managed by NCES, which is why the response to this question can vary dramatically from year to year even for the same state.

The PLS is done through a cooperative arrangement with the states. This arrangement allows IMLS to obtain administrative data that the states already collect for their own purposes. In other words, the state based collections are the prerequisite for the PLS, not the other way around.

In fact, several of the state library data collection efforts pre-date the existence of a national survey and for some states; the data collection is explicitly authorized by state based legislation. The PLS is a vehicle for state library agencies to pool their survey results into a national resource. That is why the respondent pool is limited to the state library agency data coordinators from the 50 states, DC and 4 additional territories and why the PLS has never included the burden on the public libraries that the states survey in the OMB submission.

The cost of this data collection is estimated based on the number of State Library Administrative Agency staff responsible for the collecting and reporting this information to IMLS. StLAs administer state-based surveys to the public libraries in their respective States and Outlying Areas on an annual basis. A portion of the state-based survey data is then provided to IMLS, which aggregates the information into the national PLS dataset.

The total estimate cost based on the response time and number of respondents is \$119,428. These costs were derived by multiplying the average reporting hours per respondent, by the average hourly compensation for a typical respondent (\$26.30 per hour for the combined time of a State data coordinator and a technician), by the number of projected respondents.

*Time per response is based on FY 2008 survey results that ranged from 8 hours to 396 hours (averaging 85.7 hours).

A.13. Estimate of Cost Burden to Respondents

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

A.14. Estimates of Costs to Federal Government

The total cost to the Federal government for administering the FY 2011 PLS is estimated to be \$792,974. This includes salaries and meeting expenses for IMLS (95,974) and Census Bureau \$697,000 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 additional costs to the respondents beyond those mentioned in section A. 12.

A.16. Project Schedule

The PLS data products are released to the public on the IMLS website as soon as they are available. The PLS data products include (1) the final data file (in MS-Access and ASCII format) and (2) a report in Portable Document Format (PDF) that contains an introduction, findings, and numerous tables of national and State totals. A print copy of the report will be disseminated to COSLA, State data coordinators, and the LSWG.

The PLS will follow this proposed schedule for the collection of FY 2010 data:

1.	Survey mail-out	December 8, 2010
2.	Survey due date*	April 13, 2011 (Group 1)
		August 3, 2011 (Group 2)
		August 24, 2011 (Group 3)
3.	Edit follow-up begins	Upon survey receipt (on flow basis)
4.	Final file released	May 2012
5.	Report released	June 2012

*The staggered survey due dates were established in order to accommodate the various State fiscal cycles and improve the flow of data processing at Census.

A.17. Request to Not Display Expiration Date

This collection will display the expiration date upon OMB approval.

A.18. Exceptions to the Certification

There are no exceptions to the certification.