Guidelines for Grants to States Program Five-Year Evaluations

Supporting Statement for PRA Submission



A.1. Circumstances Making the Collection of Information Necessary

A.1.a. Purpose of the Submission

Approval is requested to provide Guidelines to State Library Administrative Agencies to conduct their Five Year Plan Evaluation

The Institute of Museum and Library Services (IMLS) is the primary source of federal support for the nation's 123,000 libraries and 35,000 museums. IMLS' mission is to create strong libraries and museums that connect people to information and ideas. IMLS works at the national level and in coordination with state and local organizations to sustain heritage, culture, and knowledge; enhance learning and innovation; and support professional development.

SLAAs 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. § 9122). SLAAs are the governmental entity responsible for the administration and supervision of Library Services and Technology Act (LSTA) funds. SLAAs 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.

The Library Services and Technology Act requires each SLAA to submit to IMLS a plan that details library services goals for a five-year period. SLAAs must also conduct and submit to IMLS a five-year evaluation of library services based on that plan. *See* 20 U.S.C. § 9134. These plans and evaluations are the foundation for improving practice and informing policy. SLAAs are currently in the 2013-2017 five year period and will need guidelines for conducting the statutorily-required independent evaluation of their plans in the near future.

A.1.b. Legislative Authorization

According to 20 U.S.C. Section 9134 (a), each State library administrative agency "shall submit a State plan to the [IMLS] Director once every 5 years..." that establishes goals and specific priorities for the use of the funding available. 20 U.S.C 9134(c) specifies that "Each State library administrative agency receiving a grant under this subchapter shall independently evaluate, and report to the Director regarding, the activities assisted under this subchapter, prior to the end of the 5-year plan." The attached Guidelines are the basis on which all 50 states and five territories shall have their plans evaluated.

20 U.S.C. Section 9134. State Plans

- (a) STATE PLAN REQUIRED
 - (1) IN GENERAL

In order to be eligible to receive a grant under this subchapter, a State library administrative agency shall submit a State plan to the Director once every 5 years, as determined by the Director.

(2) DURATION

The State plan shall cover a period of 5 fiscal years.

(3) REVISIONS

If a State library administrative agency makes a substantive revision to its State plan, then the State library administrative agency shall submit to the Director an amendment to the State plan containing such revision not later than April 1 of the fiscal year preceding the fiscal year for which the amendment will be effective.

- (b) CONTENTS The State plan shall—
 - (1) establish goals, and specify priorities, for the State consistent with the purposes of this subchapter;
 - (2) describe activities that are consistent with the goals and priorities established under paragraph (1), the purposes of this subchapter, and section 9141 of this title, that the State library administrative agency will carry out during such year using such grant;
 - (3) describe the procedures that such agency will use to carry out the activities described in paragraph (2);
 - (4) describe the methodology that such agency will use to evaluate the success of the activities established under paragraph (2) in achieving the goals and meeting the priorities described in paragraph (1);
 - (5) describe the procedures that such agency will use to involve libraries and

library users throughout the State in policy decisions regarding implementation of this subchapter;

- (6) describe how the State library administrative agency will work with other State agencies and offices where appropriate to coordinate resources, programs, and activities and leverage, but not replace, the Federal and State investment in—
 - (A) elementary and secondary education, including coordination with the activities within the State that are supported by a grant under <u>section 6383</u> of this title;
 - (B) early childhood education, including coordination with—
 - (i) the State's activities carried out under subsections (b)(4) and (e)(1) of section 9837 of title 42; and
 - (ii) the activities described in the State's strategic plan in accordance with section 9837b(a)(4)(B)(i) of title 42;
 - (C) workforce development, including coordination with—
 - (i) the activities carried out by the State workforce development board under section 3111 of title 29; and
 - (ii) the State's one-stop delivery system established under <u>section</u> 3151(e) of title 29; and
 - (D) other Federal programs and activities that relate to library services, including economic and community development and health information;
- (7) provide assurances that the State will comply with subsection (f) of this section; and
- (8) provide assurances satisfactory to the Director that such agency will make such reports, in such form and containing such information, as the Director may reasonably require to carry out this subchapter and to determine the extent to which funds provided under this subchapter have been effective in carrying out the purposes of this subchapter.

(c) EVALUATION AND REPORT

Each State library administrative agency receiving a grant under this subchapter shall independently evaluate, and report to the Director regarding, the activities assisted under this subchapter, prior to the end of the 5-year plan.

(d) INFORMATION

Each library receiving assistance under this subchapter shall submit to the State library administrative agency such information as such agency may require to meet the requirements of subsection (c) of this section.

- (e) APPROVAL
 - (1) IN GENERAL

The Director shall approve any State plan under this subchapter that meets the requirements of this subchapter and provides satisfactory assurances that the provisions of such plan will be carried out.

(2) Public availability

Each State library administrative agency receiving a grant under this subchapter shall make the State plan available to the public, including through electronic means.

A.1.c. Prior Related Studies

SLAAs have conducted five year evaluations in the past, based upon guidance that was issued by IMLS. In previous evaluation periods, SLAAs were provided with guidance for conducting the independent, five-year evaluation, but no specific questions or methodologies were recommended or required. In reviewing the subsequent reports, it became clear that while states were able to gather data about the effectiveness of their own programs, it was impossible for them to compare the data with and against their peers. Valid comparisons across states or program types were not possible because the SLAAs were not necessarily responding to like evaluative criteria. Because of this, the **Guidelines for Grants to States Program Five-Year Evaluations** were drafted and are submitted here. Using a consistent set of evaluation questions and methodologies will allow SLAAs to compile, present, and share data on outputs and outcomes, and potential impact of services across all states participating in the LSTA program. *Note: this is not an IMLS data collection, but guidelines all states will use in conducting independent evaluations of their services. IMLS will receive copies of those evaluations, but does not manage the data being collected or direct any single methodology to be used.*

A.2. Purposes and Uses of the Data

Section 9134 (c) of IMLS' authorizing legislation directs SLAAs to "independently evaluate, and report to the (IMLS) Director regarding, the activities assisted under this subchapter, prior to the end of the 5-year plan." This evaluation provides SLAAs an opportunity to measure progress in meeting the targets set in their approved five-year plans and is designed to help states make effective resource allocation decisions in their upcoming five-year plans.

While both of these goals are important, previous guidance documents from IMLS focused primarily on the assessment of past practice. To make a more deliberate link between the evaluation findings and the SLAAs' next five-year plans, IMLS is providing new guidance. This guidance identifies a core set of research questions that are designed to:

- highlight effective past practices;
- identify processes at work in implementing the activities in the plan, including the use of performance-based measurements in planning, policy making and administration, and;
- develop key findings and recommendations from evaluating the past five years for inclusion in the next five-year planning cycle.

A.2.b. Research Issues Addressed

None.

A.3. Use of Improved Information Technology

N/A

A.4. Efforts to Identify Duplication

There is no duplication of effort between the SLAAs Five Year Evaluation and the annual, project-based data SLAAs must report as a part of the State Program Report (LSTA reporting). The Five Year evaluation compiles information about the SLAAs meeting their overall goals based on sets of activities outlined in their mandatory Five Year Plans. The annual State Program Report captures data at the project and annual funding level. That data is likely to be leveraged as a part of the SLAA's analysis of its activities, but is not duplicative in any way.

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

There will be no impact on small businesses or other small entities. The collection of information involves only State library administrative agencies.

A.6. Frequency of Data Collection

The SLAA Survey is required every five years, based upon the statute, 20 U.S.C. Section 9134 (c)(d).

A.7. Special Circumstances of Data Collection

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

A.8. Consultation and Feedback from Outside the Agency

A.8.1. Public comments solicited through Federal Register

IMLS published a notice in the *Federal Register* with a 60-day public comment period to announce this proposed information collection on January 20, 2016 (Volume 81, Number 12, page 3165; 2016-00768). A copy of the Federal Register Notice is provided with the submission. One comment was submitted.

IMLS published a notice in the Federal Register on April 12, 2016 (Volume 81, Number 70, page 21593; 2016-08370), with a 30-day public comment period to announce forwarding of the information collection request to OMB for approval.

A.8.2. Consultants Outside the Agency

The SLAAs were informally consulted in the revision of the **Guidelines for Grants to States Program Five-Year Evaluations**. Discussions took place at the Chief Officers of State Library Agencies meeting at the American Library Association 2016 Midwinter Meeting.

A.9. Provision of 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. Sensitive Questions

There are no sensitive questions on this survey.

A.12. Estimated Response Burden

The cost to respondents is estimated to be \$138,303. This estimate is derived using the standard IMLS procedure: multiplying the estimated reporting hours per respondent (90), by the average hourly compensation for a typical respondent (\$27.94 per hour, for the combined time of a State library respondent (key holder) and a technician), by the projected number of respondents (55).

<u>Survey</u>	Number of respondents	Estimated response time*	Total burden hours
	50 States, DC, PR, VI,		
SLAA	AS, Guam	90 hours	4,950

46A.13. Estimates of Cost

There are no record keeping or reporting costs to the respondents beyond those described in section A12.

The Estimated Cost Burden is \$138,303 (4,950 hours total time burden times \$27.94 per hour).

A.14. Annualized Cost to the Federal Government

A.15. Reasons for Changes in Response Burden and Costs

There are no changes from the OMB Form 83-I.

A.16. Publication Plans and Time Schedule

As with previous years, IMLS intends to release the SLAA five year evaluations to the public on the IMLS website as soon as they are completed and accepted by IMLS program officers. The evaluations are due from the SLAAs on March 30, 2017.

The SLAA evaluations are submitted as PDFs to IMLS program officers. Once approved, the Five Year Evaluations are uploaded to the IMLS as a part of State Profiles. Evaluations from the 2008-2012 period may be found here: https://www.imls.gov/grants/grants-state/five-year-evaluations.

A.17. Approval for Not Displaying the Expiration Date for OMB Approval

No exemption from the requirements to display the expiration date for OMB approval of the information collection is being requested for the SLAA Five Year Evaluation. The OMB approval number and expiration date will be displayed on the Five Year Evaluation Guidelines.

A.18. Exceptions to the Certification Statement

No exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I apply to the **Guidelines for Grants to States Program Five-Year Evaluations.**