

State Library Administrative Agencies (SLAA) Survey Data Collection

Supporting Statement for PRA Submission

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Justification

A.1. Circumstances Making the Collection of Information Necessary

A.1.a. Purpose of the Submission

Approval is requested to conduct information collection for the State Library Administrative Agencies (SLAA) Survey

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.

The State Library Administrative Agencies (SLAA – formerly known as StLA) survey is a cooperative effort of the Institute of Museum and Library Services (IMLS), the Chief Officers of State Library Agencies (COSLA), and American Institutes for Research (AIR) (the current 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. The Steering Committee included representatives from State library agencies, the American Library Association (ALA), the former National Commission on Libraries and Information Science (NCLIS), IMLS, and the Census Bureau. In December 2008, IMLS combined the SLAA 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 five members who represent the library community at-large, including relevant library associations, data users, and members of the research community. The SLAA Survey was administered annually until fiscal year (FY) 2010, at which point administration was changed to biennially. The SLAA survey replaced the COSLA Financial Survey of State Library Agencies, which was conducted annually, due to the importance of these data to SLAAs and to State and federal policymakers.

The SLAA Survey collects descriptive data about SLAAs, including information on 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 libraries, help to complete the national picture of library service.

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. 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 SLAAs to libraries and library cooperatives are not reported elsewhere. SLAA services provided to State government are not presently covered in any other data collection.

Without data on SLAAs, the IMLS data systems are incomplete. SLAAs are a central and vital component of the library infrastructure. SLAAs play a leadership role in assisting public libraries to respond to goals of the administration and State initiatives for libraries and library services, such as education and technology.

A.1.b. Legislative Authorization

IMLS is responsible for identifying national needs for and trends in museum, library, and information services. IMLS must also report on the impact and effectiveness of museum, library, and information services throughout the United States, including programs conducted with funds made available by IMLS. IMLS must identify and disseminate information on the

best practices of such programs. This data collection is authorized by 20 U.S.C. § 9108 (Policy research, analysis, data collection, and dissemination).

20 U.S.C. Section 9108. Policy research, analysis, data collection, and dissemination

(a) In general

The Director shall annually conduct policy research, analysis, and data collection to extend and improve the Nation’s museum, library, and information services.

(b) Requirements

The policy research, analysis, and data collection shall be conducted in ongoing collaboration (as determined appropriate by the Director), and in consultation, with –

- (1)** State library administrative agencies;
- (2)** National, State, and regional library and museum organizations;
- (3)** Other relevant agencies and organizations.

(c) Objectives

The policy research, analysis, and data collection shall be used to –

- (1)** Identify national needs for and trends in museum, library, and information services;
- (2)** Measure and report on the impact and effectiveness of museum, library, and information services throughout the United States, including the impact of Federal programs authorized under this chapter;
- (3)** Identify best practices; and
- (4)** Develop plans to improve museum, library, and information services of the United States and to strengthen national, State, local, regional, and international communications and cooperative networks.

(d) Dissemination

Each year, the Director shall widely disseminate, as appropriate to accomplish the objectives under subsection (c), the results of the policy research, analysis, and data collection carried out under this section.

As required by 20 U.S.C. § 9108, IMLS is seeking to conduct an analysis of national trends in library and information services. IMLS library survey activities will be designed to address high-priority library data needs; to 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 policymakers, practitioners, data users, and the general public.

A.1.c. Prior Related Studies

The SLAA survey has been conducted 19 times since 1994. The survey was initially administered by the National Center for Education Statistics (NCES), until October 2007, when administration was handed over to IMLS. Beginning with the collection of the SLAA FY2007 collection, IMLS has administered the survey 6 times, with the most recent done for FY2014.

A.2. Purposes and Uses of the Data

The purpose of the SLAA Survey is to provide State and federal policymakers and other interested users with information about State library agencies. The collected data are useful to (1) chief officers of SLAAs, (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 use these data in planning, as they make policy decisions about legislation, appropriations, and resource allocations, and in their monitoring of 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. SLAAs will use the data for State, regional, and national comparisons of library services and resources to determine the level of SLAA operations in agencies of similar size and characteristics and to plan for the effective use of funds.

The public library components of the SLAA survey, when added to the data collected by the IMLS Public Libraries Survey, help complete the national picture of public library service. The SLAA Survey is the only survey that collects data regarding 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, SLAAs 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 SLAAs in the provision of statewide services to libraries and library cooperatives, and their contribution to the education infrastructure of the nation.

The SLAA Survey provides IMLS with data to monitor the financial and service capacity of the State Library Administrative Agencies and to analyze changes in these characteristics over time. Data elements in the survey have been used for annualized state-by-state reports and for a more detailed trend analysis:

- Swan, D.W., et al. (2014). *State Library Agencies Survey: Fiscal Year 2012* (IMLS-2014=SLAA-01).
(https://www.imls.gov/sites/default/files/publications/documents/2012-slaa-report_0.pdf)
- Swan, D.W., et al. (2011). *State Library Agencies Survey: Fiscal Year 2010* (IMLS-2010-StLA-01). Washington, DC: Institute of Museum and Library Services.
<https://www.imls.gov/sites/default/files/publications/documents/stla2010.pdf>
- Henderson, E. & Manjarrez, C. (2010). *State Library Agency Service Trends: 1999-2008*. Research Brief series, no. 2 (IMLS-2010-RB-02). Washington, DC: Institute of Museum and Library Services.
(http://www.imls.gov/assets/1/AssetManager/Brief2010_02.pdf)

Monitoring the fiscal and service conditions of these organizations is an important function for IMLS, which administers Grants to States 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 sub-grant competitions or cooperative agreements to public, academic, research, school, and special libraries in their state. The survey 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 the Library Services and Technology Act grant in their respective states, SLAAs are also important for delivering federal programs outside of IMLS, including programs focused on broadband, such as the FCC E-Rate Program for Schools and Libraries.

A.2.b. Research Issues Addressed in the SLAA

A.3. Use of Improved Information Technology

The SLAA 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 data elements from the prior data collection where the responses are not expected to change annually—176 of 390 (62 percent) of all survey items for the proposed FY 2016 questionnaire. The respondent is instructed to review the pre-entered data and update any information that has changed. 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 data file, data documentation, 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 members of the LSWG. Data files are also uploaded to data.gov.

A.4. Efforts to Identify Duplication

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

As indicated previously, the LSWG provides continuing input into the design and conduct of the survey and includes representatives from State library agencies, the American Library Association, IMLS and the survey contractor. 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 SLAA Survey.

The Institute of Museum and Library Services (IMLS) administers the LSTA program. IMLS distributes the LSTA funds to SLAAs, 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 SLAA Survey collects some LSTA data. However, the data are not directly comparable to the administrative data requested in the IMLS annual State program report. On the SLAA 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 in the reporting timeframes would not be acceptable for a 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 SLAA Survey. For example, IMLS collects administrative data on only the number of LSTA grants awarded whereas the SLAA Survey (Part H) collects data on the number of both LSTA *and State* grants awarded. In addition, IMLS requires that States report funds “available” for the federal fiscal year for individual sub-grants, including carryover. It would not be feasible for States to report LSTA allocations received from IMLS as revenue on the SLAA Survey since many States, by law, cannot report their allotments as revenue until they expend the funds. Further, Part L of the SLAA Survey requests total LSTA State Program expenditures during the State fiscal year covered by the survey, by type and use of expenditure. In addition, IMLS collects administrative data on different expenditure categories than what gets included in the SLAA Survey

The SLAA and IMLS’s administrative data collections have fundamentally different purposes. The SLAA Survey is conducted in fulfillment of IMLS’s duties as a Federal agency with statistical programs to collect, collate, analyze, and report full and complete statistics on the condition of libraries in the United States. The survey provides a descriptive database of SLAAs for this purpose. IMLS administrative data collections are intended to ensure needed monitoring compliance with Federal grant-making provisions. (See 2 C.F.R. Part 200.)

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

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 will be administered biennially. The survey had been administered annually from FY1992 to FY201. In an effort to reduce costs, IMLS changed the frequency to a two year, biennial cycle after the FY2010 collection.

Chief Officers of SLAAs continue to need these data on a frequent and regular basis for program planning and budget-setting. Through their Chief Officer of State Libraries Association (COSLA), these chief officers also seek to continue their historical time series of data on SLAAs through the SLAA survey. The high value that the SLAAs 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 SLAA 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. Although the SLAA Survey is currently administered biennially because of an effort to reduce costs, there remains significant potential benefit to conducting both the SLAA and Public Libraries Survey on an annual basis.

It usually takes several years for libraries to develop administrative records systems and to staff the library statistics specialty. Conducting this survey less frequently 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. Indeed, these concerns, and the important value of this data collection, have been repeatedly and forcefully expressed to IMLS by the Chief Officers of State Library Agencies (COSLA) and the IMLS LSWG, who, in fact, urge the *annual* conduct of the SLAA Survey.

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 May 27, 2016 (81 FR 33710). A copy of the Federal Register Notice is provided with the submission. No comments were submitted.

IMLS published a notice in the *Federal Register* on November 3, 2016 (Volume 81, Number 213, pages 76630-76631), 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 LSWG is consulted in the design and conduct of the SLAA survey. The Working Group includes staff of State library agencies (including chief officers and survey respondents), the ALA, IMLS and the survey contractor. They reviewed the FY 2014 questionnaire and deliberated on the proposed recommended non-substantive changes to a few items in the FY 2016 questionnaire (tracked changes to the proposed questionnaire are included as an attachment).

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 survey respondents is estimated to be \$35,623.50. This estimate is derived using the standard IMLS procedure: multiplying the estimated reporting hours per respondent (24), by the

average hourly compensation for a typical respondent (\$27.4 per hour, for the combined time of a State library survey respondent (key holder) and a technician), by the projected number of respondents (51).

| <u>Survey</u> | <u>Number of respondents</u> | <u>Estimated response time*</u> | <u>Total burden hours</u> |
|---------------|------------------------------|---------------------------------|---------------------------|
| SLAA | 50 States and DC | 25 hours | 1,275 |

*Time per response is based on FY 2014 survey results..

A.13. Estimates of Cost

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

The Estimated Cost Burden per survey administration is \$35,623.50 (1,275 hours total time burden times \$27.94 per hour).

A.14. Annualized Cost to the Federal Government

The total cost to the federal government for administering the FY 2016 SLAA survey is estimated to be \$402,573. This includes salaries and expenses for IMLS staff (\$49,369) and the total cost of the contractor’s activities, including contractor staff salaries (\$353,204) - for this biennial survey (administered by a contractor).

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

IMLS intends to release the SLAA data products to the public on the IMLS website as soon as they are completed and prepared for publication. The SLAA data products include (1) the final data file (in multiple formats, including SAS, Excel, and a flat file), (2) documentation for the data, including file layout and definitions of data elements, and (3) 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 members of the LSWG.

The SLAA 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. IMLS may also disseminate data to the public using online data visualization tools and other instruments to make the information more useful for the public

The SLAA FY2016 Survey has the following proposed schedule:

- | | |
|------------------------------------|-------------------------------------|
| 1. Survey mail-out | January 18, 2017 |
| 2. Survey due date | February 21, 2017 |
| 3. Edit follow-up begins | Upon survey receipt (on flow basis) |
| 4. SLAA Survey data files released | August 18, 2017 |
| 5. SLAA Survey report | September 2, 2017 |

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 data collection. The OMB approval number and expiration date will be displayed at the top of the web survey instrument.

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 SLAA Survey.