

## Public Libraries Survey (PLS) Data Collection

### Supporting Statement for PRA Submission

# A

## 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 Public Libraries Survey (PLS)**

The Institute of Museum and Library Services (IMLS) requests clearance from the Office of Management and Budget (OMB) for the collection of the Public Libraries Survey (PLS): Fiscal Year (FY) 2016, FY 2017, and FY 2018. This survey was first conducted 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 2013, FY 2014, and FY 2015 (3137-0074).

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.

#### **Necessity of the Information Collection**

PLS is an effort between the IMLS, the American Institutes for Research (AIR, 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 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 administrative agencies (formerly known as State library agencies) (SLAAs) and ALA. In December 2008, IMLS combined the PLS Steering Committee and the State Library Agency Steering Committee into one committee, the Library Statistics Working Group (LSWG). The LSWG serves the same function as the former steering committees. It includes five members of the Chief Officers of State Library Agencies (COSLA), five State data coordinators (SDCs), five members selected from relevant library associations, data users, and members of the research community.

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 SDCs located in the SLAAs. 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 9,300 public library systems 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.

#### **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.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 United States. The PLS is a national census of public library systems and their service outlets including descriptive data for each State and for each public library system. The data allow for comparisons among libraries of similar size on variables such as size of collection, total number of staff, and total operating expenditures. IMLS’ data catalog and visualization tools, accessible through the IMLS website, facilitate these peer comparisons.

Federal, State, and local officials use these data to inform 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 2010. 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, 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 public librarianship and to improve its practice. Private companies need reliable national, state, and local 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 Improved 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 converting the web application received Census' Bronze Medal Award "for innovation and effective customer satisfaction," for reducing respondent burden, improving timeliness and increasing data quality.

In 2015 IMLS awarded the FY 2015 PLS contract to AIR. AIR created a new web application, PLS Web Portal, using the same functionality as Census' WebPLUS. The survey web application allows direct data entry or the import of data from external files (e.g., Microsoft Excel, comma delimited text, or fixed length text formats). An edit check tool generates on-screen warnings during the data entry and 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 various visualization tools available to the public on the IMLS website.

#### **A.4. Efforts to Identify Duplication**

The PLS is the only known universe survey of public libraries in the United States. Individuals on the LSWG provide continuing guidance in the design and administration of the survey. The LSWG includes members selected from SLAAs and the library field. 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 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 FY 2014 PLDS annual survey collected data from 1,894 public libraries across the United States and Canada, and is not a universe. Although over 50 percent of the PLDS respondents represent public libraries serving populations of over 100,000, 93.7 percent of U.S. public libraries have a service area population of less than 100,000. The PLS is a universe survey of approximately 9,300 public libraries in the United States, the District of Columbia, and outlying areas

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

- The data elements from the two surveys are not comparable. Although there is some overlap of items, such as type of outlet, revenue, operating expenditures, number of staff, and electronic circulation, the PLDS also collects some data elements not collected under the PLS (e.g., in-library use of materials, details on summer reading programs, some holdings, social networking 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 and video materials (both physical and downloadable); number of librarians with and without a Master's degree in Library Science (MLS) from a program accredited by the ALA; unduplicated population of legal service areas; capital expenditures; and wireless sessions. New items for FY 2016 are physical item circulation, successful retrieval of electronic information, electronic content use, and total collection use.

## **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 public libraries.

## **A.6. Frequency of 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, SLAAs, researchers, and others use the data to assess the condition of public libraries. Although the PLS data comprise part of the data most SLAAs 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 SLAAs (the data providers), AIR, 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 SLAAs 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 of Data Collection**

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

## **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 August 16, 2016, Volume 81, Number 158, pages 54608-54609. A copy of the Federal Register Notice is provided in Attachment A. No comments were submitted.

IMLS published a notice in the *Federal Register* on November 3, 2016, Volume 81, Number 213, pages 76631-76632, 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**

Individuals on the LSWG are consulted in the design and conduct of the PLS survey. LSWG includes individuals from SLAAs (including chief officers and SDCs), the ALA, and IMLS with relevant subject matter expertise.

### **A.9. Provision of 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 SDCs 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. 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. Estimated Response Burden**

The PLS data are usually only part of the data that SLAAs collect on their surveys of public libraries. The PLS data are extracted from the State surveys by the SDCs and reported to IMLS on the survey web application (PLS Web Portal).

The annual time burden estimate was calculated as the sum of the hours reported by on the certification form that the SDCs completed when they submit their data. However, there is a great deal of variability in this response from state to state. The time per response is based on results from the administration of the PLS FY 2015. Response time was reported by each SDC. Response time for the FY 2015 administration ranged from 20 hours to 525 hours, with an average response time of 104.98 hours.

The administration of the PLS has remained very similar to when it was moved from NCES to IMLS. The variability of this particular item may be attributable to several things, such as changes in the methodology for calculating burden or the lack of reliability in the responses to this item. Additionally, there may be a new SDCs each year, which may lead to responses to this question varying dramatically from year to year even from the same state. Prior to FY 2011, this information was not collected through the web-based tool, and thus did not include accompanying documentation and definitions, like the other questions in the survey. In FY 2015, the online tool integrated clarifying definitions for the data providers, provided helpful documents on each screen to assist the SDCs with that stage of the data collection process, presented a user-friendly interface, and digitized the data certification process (previously submitted to Census by fax). IMLS anticipates that this should yield more reliable reporting of burden estimates in the future administrations.

Estimated Total Annual Hour Burden is 5,878.88 hours (104.98 hours times 56 respondents [50 States, the District of Columbia, and five outlying areas]).

The PLS is done through a cooperative arrangement with the states. This arrangement provides IMLS with the opportunity 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.

Several of the state library data collection efforts pre-date the existence of a national survey. For some states, the data collection is explicitly authorized by state-based legislation. The PLS is a vehicle for SLAAs to pool their survey results into a national resource. That is why the respondent pool is limited to the SDCs from the 50 states, the District of Columbia, and five outlying 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 SLAA staff responsible for the collecting and reporting this information to IMLS. SLAAs 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 estimated cost based on the response time and number of respondents is \$164,255.91. These costs were derived by multiplying the average reporting hours per respondent, by the average hourly compensation for a typical respondent (\$27.94 per hour for the combined time of an SDC and a technician), by the number of projected respondents.

This survey will be conducted annually.

### **A.13. Estimates of Cost**

The Estimated Total Annual Cost Burden is \$164,255.91 (5,878.88 hours total time burden times \$27.94 per hour), as mentioned in section A.12.

### **A.14. Annualized Cost to the Federal Government**

The total cost to the Federal government for administering the FY 2016 PLS is estimated to be \$925,193. This includes salaries and meeting expenses for IMLS (\$156,836) and AIR (\$768,357) for this annual survey administered by AIR.

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

There are no additional costs to the respondents beyond those mentioned in section A.12.

### **A.16. Publication Plans and Time 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 files (provided in various formats, including SAS and comma-delimited files), (2) data documentation (in Portable Document Format (PDF)), and (3) a report of findings (in PDF) that contains an introduction, findings, and tables of national and State totals. These are all published for the public on the IMLS website.

The PLS will follow this proposed schedule for the collection of FY 2016 data:

Survey mail-out	December 13, 2016
Survey due date*	Group 1: April 7, 2017

	Group 2: July 28, 2017 Group 3: August 18, 2017
Edit follow-up begins	Upon survey receipt (on flow basis)
Final file released	May 2018
Report released	November 2018

\*The staggered survey due dates accommodate the various State fiscal cycles and improve the flow of data processing at AIR.

### **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 PLS data collection. The OMB approval number and expiration date will be displayed on all survey instruments and discussion guides.

### **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 PLS.