Data Collection: A Needs Assessment of Programs, Services, and Operations of Tribal Archives, Libraries, and Museums

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 for the Association of Tribal Archives, Libraries, and Museums (ATALM) to conduct an information collection, "A Needs Assessment of Programs, Services, and Operations of Tribal Archives, Libraries, and Museums." This needs assessment is a cooperative effort with the Institute of Museum and Library Services (IMLS). The assessment includes a survey that will collect descriptive data about United States-based tribal[1] cultural organizations (including archives, libraries, museums, and cultural centers). Data collected through the survey will inform a formal report on the activities and needs of tribal cultural organizations and address the lack of data about tribal archives, libraries, and museums currently collected by other surveys.

ATALM has budgeted $68,000 for the proposed survey and resulting report, which includes a contract with the Native Nations Institute at the University of Arizona to analyze the data and produce the report.

ATALM is a non-profit membership organization incorporated in 2010 for the purpose of providing culturally relevant programming and services, supporting collaboration among tribal and nontribal cultural organizations and identifying and addressing contemporary issues related to sustaining the cultural sovereignty of Native Nations. ATALM has both a Native-led board

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[1] "Tribal" refers to any tribe, band, nation, or other organized group or community, including any Alaska native village, regional corporation, or village corporation (as defined in, or established pursuant to, the Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq.)), which is recognized by the Secretary of the Interior as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

and an advisory council composed of representatives from many tribal nations. Board members represent a broad range of library, museum, and archival experiences. At the core of ATALM's support for indigenous cultural organizations are annual continuing education programs that help ensure a well-trained workforce for indigenous knowledge management. ATALM also compiles reports drawing on original research, including surveys and interviews with tribal memory organizations. ATALM has 1,200 founding members. Its work is primarily supported through a Cooperative Agreement with IMLS.

A.1.b.   Legislative Authorization

IMLS is the primary source of federal support for the nation's libraries and museums. We advance, support, and empower America's museums, libraries, and related organizations through grant making, research, and policy development. Our vision is a nation where museums and libraries work together to transform the lives of individuals and communities. To learn more, visit www.imls.gov.

IMLS is responsible for identifying national needs for and trends in museum, library, and information services. IMLS must also measure and report on the impact and effectiveness of museum, library, and information services throughout the United States, including the impact of programs conducted with funds made available by IMLS. IMLS must identify the best practices of such programs and disseminate the results of its policy research, analysis, and data collection. This data collection is authorized by 20 U.S.C. § 9108 (Policy research, analysis, data collection, and dissemination).

A.1.c.   Prior Related Studies

ATALM completed an earlier survey on which the proposed survey is based in 2012. This earlier work reported data on 176 respondents who operated tribal cultural organizations at the time of the survey. The resulting report, "[Sustaining Indigenous Culture: The Structure, Activities and Needs of Tribal Archives, Libraries, and Museums](#)," is a unique source of data on tribal cultural organizations referenced by researchers, program planners, policy makers, grant seekers, and the media. While the 2012 study was an important contribution to the field, staffing and collections changes along

with the on-going evolution of technology use at tribal cultural institutions suggest a need to update the 2012 results.

Earlier, a [2002 survey of 74 tribal museums](#) was conducted by the American Association of State and Local History (funded by IMLS). This 2002 survey found that tribal museums faced financing and staff training as two key challenges. A student thesis in 2012 included a survey of five new tribal museums (Lee 2012) to articulate the challenges American Indian museum directors faced in establishing their organizations.

Most general studies of museums, however, include too few tribal organizations to enable meaningful analyses. For example, another IMLS-funded study in 2014 in collaboration with Heritage Preservation and RMC Research Corporation sought to understand the preservation needs of U.S. collecting organizations. However, too few (<5) tribal cultural organizations were among the respondents to permit a specific focus on these organizations.

The secondary literature has provided inadequate coverage on archives, libraries and museums. For example, perhaps the most significant publication over the past decade was a 2011 book titled "Tribal Archives, Libraries, and Museums: Preserving Our Language, Memory, and Lifeways," but it overwhelmingly focused on tribal libraries, with just one chapter about museums and three about archives among the 25 chapters in the edited volume. Hence, a survey that looks at all three types of tribal cultural organizations—archives, libraries, and museums—is expected to be valuable to the field, as described in the Section A2, below.

A.2.   Purposes and Uses of the Data

Data will be collected from tribal cultural organizations that implement one or more of the functions associated with libraries[2] and/or museums. The organizations that carry out these functions are often complex. For example, not all federally-recognized tribal entities have cultural organizations specifically named "library" or "museum." Some tribal entities operate cultural centers that provide library and/or museum services under one umbrella organization. The complexity of these organizations and their location within sovereign tribal nations present challenges for gathering data

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[2] Archives, while not directly included in IMLS authorization, often are the site of library and/or museum services and programs for tribal communities.

about these cultural organizations' challenges, needs, and roles in their communities. No other survey, besides the 2012 ATALM survey referenced above, has collected this information. Additionally, by surveying IMLS tribal awardees, the proposed study will also reach tribes that are not currently active with ATALM. The proposed survey seeks to address this gap in our knowledge about U.S. cultural organizations.

As such, the proposed survey and resulting report with joint support by IMLS and ATALM as organizations that have historically worked with the potential respondents, provides an opportunity to collect, analyze, and report data on needs of tribal cultural organizations that serve their communities via library and/or museum functions. The questionnaire will collect data on visitors, services and programs, collections, finances, and needs. By including questionnaire items from a previous survey by ATALM (2012) as well as ones from other IMLS instruments (e.g., the Public Libraries Survey and the Heritage Health Information Survey), the results will provide a way for tribal cultural organization stakeholders to benchmark with national level results about programs and needs.

The data will be analyzed and compiled into a report that will provide an updated national picture of the condition and needs of tribal cultural organizations (as compared to the 2012 ATALM study report, cited above). The report will help guide decision-makers and funders in developing and supporting programs for tribal cultural organizations that:
- Enables tribal cultural organizations to view their programs and needs in the context of those of their peers;
- Raises organizational and community awareness of the museum and library needs of tribal communities; and
- Allows researchers to develop a broad picture of tribal archive, library, and museum services and programs.

Due to limited resources available to tribal libraries, archives, and museums, there are few opportunities for professionals in these organizations to network with one another and learn about current challenges to daily practice. This survey and the related report would help practitioners learn about the state of the field in a way that is not currently available. From an agency perspective, lack of an appropriate landscape study with valid and reliable data about staff training needs (for example) is a barrier to IMLS providing robust, focused technical assistance to tribal cultural organizations.

The planned final report will include the following sections: executive summary; introduction; methodology; summary of findings; recommendations; appendices; and a list of participating organizations that have indicated consent to being included in this list. The executive summary will be a useful stand-alone document, which can be shared with other Federal agencies that are interested in tribal issues.

A.3.   Use of Improved Information Technology

The ATALM survey data will be collected over the Internet via SurveyMonkey. The survey instrument includes instructions, the questionnaire, and contact information in the event a respondent requires assistance. A separate glossary will be provided to address questions respondents may have about definitions of key terminology with notations on the survey to indicate terms respondents can find in the glossary. The survey and associated glossary are shown in Appendix A.

The web survey is designed to minimize respondent burden, to improve the timeliness and quality of the data, and to require minimal follow-up for data problems. The questionnaire uses skip logic, a feature that changes what question a respondent sees next based on their answer to the current question, to reduce respondent burden and increase data reliability. In Appendix A, instructions associated with skipping are shown on the survey. Many items will be answered by means of drop-down responses, which also reduces burden on respondents. Other items that ask for similar types of assessments have been grouped into matrices, to permit respondents to select radio buttons within appropriate response categories.

- There are 110 separate fixed-choice items (i.e. respondent will click a radio button or make a selection form a drop-down menu);
- There are seven additional items that are contingent on prior answer plus additional fixed-choice items for libraries only and one additional fixed-choice item for museums only;
- Six items include an option for "Other" with space for additional detail;
- Two written response boxes are provided near the conclusion of the survey – one short, the other about a paragraph;
- Respondents are asked to provide contact information at the end of the survey (nine separate pieces of information) to facilitate any necessary follow-up and to which a link to the final report can be sent.
- Questions asking potentially sensitive information included "prefer not to answer" as a response category.

- A "Don't know" response category is included to permit rapid skipping for items that might not be easily answered by respondents.

Survey responses will be collected using SurveyMonkey, with links sent via e-mail from an ATALM address with a unique identifier provided to each respondent to permit tracking to facilitate focused follow-up associated with either non-response or other data entry questions. Collector options will limit access to the pre-determined list of project directors/lead staff of identified tribal archives, libraries, and museums.

The e-mail conveying the SurveyMonkey link and unique identifier, will also include a glossary of terms and a PDF version of the survey (as shown in Appendix A) to facilitate respondents' completion. For those respondents who prefer to do so, the option of sending in a survey completed by hand will be available.

The final report will be released in digital format on the ATALM website and distributed electronically to ATALM members, survey participants, and IMLS.

A.4.   Efforts to Identify Duplication

ATALM is one of the only organizations that collects data on the activities and needs of U.S.-based tribal cultural organizations of various types. As noted in section A1c above, in many cases, tribal cultural organizations may have been included in other studies, but the relatively small number of respondents does not permit robust analyses.

At the federal level, the IMLS annual Public Libraries Survey (PLS) includes data for tribally-controlled libraries in just six of the 50 U.S. states that report PLS data, representing a limited geographic frame for tribal public libraries. The 2016-2017 Academic Libraries Survey component of the Integrated Postsecondary Education Data System (IPEDS) includes data for 34 tribal institutions and is another federal data collection that focuses exclusively on libraries. However, it does not include data on tribal museums or archives. PLS and IPEDS combined provide data for about 100 tribal libraries. However, an analysis of IMLS awarded grants found that well over 300 tribes operate libraries, suggesting that the coverage on these other two federal data collections is highly limited. Furthermore, the proposed survey includes many items that are not included on these other Federal collections,

especially about the unique challenges, needs, and operations of tribal cultural organizations.

In addition to these federal efforts, two other recent surveys were fielded to tribal cultural organizations. First, the American Indian Library Association emailed surveys to potential respondents in September 2018 in order to assemble a directory of tribal libraries. (https://ailanet.org). Second, ATALM[3] administered a survey in November-December 2018 to its members titled "Cultural Facilities in Native Communities: Present & Future." Data analysis and reporting are in progress with these data. This recent ATALM survey was focused exclusively on facilities, and none of its substantive questions are repeated in the proposed questionnaire.

The proposed survey covers a number of important dimensions of interest to ATALM, IMLS, and tribal cultural organization stakeholders about how they interact with their communities, their needs, and challenges. Additionally, the proposed survey will permit analyses of similarities and differences across tribal cultural organizations based on key factors such as (but not limited to) budget level, geographic location, types of collections and services provided to their communities.

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 tribally-affiliated cultural organizations.

A.6.   Frequency of Data Collection

The 2012 survey collected benchmark data on the activities and needs of indigenous cultural organizations. The 2019 survey incorporates many questions that were asked of tribal cultural organizations by ATALM, so comparative analysis with previous data will provide insights to tribal cultural organization stakeholders about recent trends. The 2019 survey will then be used to plan for future surveys, with such planning taking into consideration

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[3] Additionally, in 2013 ATALM also administered a survey to tribal organizations about the FCC's Schools and Libraries Universal Service Program (E-Rate). Two items in the proposed survey (Question 25 and its contingency item Question 25a) are based on ATALM's prior research on E-Rate.

the possible burden on respondents and value of information to inform the decision about the appropriate frequency of data collection.

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 July 7, 2017 (81 FR 31637). The 30-day Federal Register notice was published on December 28, 2018 (83 FR 67364). No comments were submitted.

A.8.2.　Consultants outside the Agency

The ATALM Survey Advisory Council includes representatives from the ATALM, the National Museum of the American Indian, Washington State University/Sustainable Heritage Network, Harvard Project on American Indian Economic Development, Cherokee Heritage Center, Institute of American Indian Arts, First Archivists Circle, University of Oregon, American Indian Language Development Institute, Administration for Native Americans, Digital Inclusion Corps, Oklahoma Department of Libraries, United Keetoowah Band of Cherokee Indians, and Wolf Consulting. They reviewed the FY 2012 questionnaire and deliberated on this proposed survey instrument.

A.9.　Provision of Payments or Gifts to Respondents

There are no payments or gifts to respondents.

A.10.　Assurance of Confidentiality

Any personally identifiable information (PII) collected (e.g., the name and other personal information of the individual responding on behalf of the tribal cultural organization) will be kept secure during data collection, securely

stored, and accessed only by authorized ATALM staff and the data analysis contractor. No personal data will be published (i.e., included in the final report) unless expressly approved by the respondent. Assurances of security of PII will be conveyed at the beginning of the survey instrument.

Prior ATALM survey reports included a list of participating organizations as an appendix. The proposed survey includes two concluding questions (Questions 31 and 32) to permit respondents to opt in for inclusion in such a list. However, no specific responses will be associated with specific respondents.

A.11.   Sensitive Questions

Question sensitivity was considered when developing the survey instrument. While previous surveys by ATALM and IMLS were used as a guide, question-sensitivity issues are of paramount importance within the context of tribal cultural organizations. Therefore, the response choice "Prefer not to answer" was included for many questionnaire items. Such responses (i.e., "prefer not to answer") will be a valuable tool in future survey planning for leaders of tribal cultural organizations.

A.12.   Estimated Response Burden

Table 1. Estimated Response Burden for Each Type of Respondent

Participant group	Universe	Expected # of Respondents[1]	Hours per Response	Total Hours	Cost per group[2]
Organizations with archive or museum functions only (fewest applicable questions)	150	60	0.5 Hour	30 hours	$836.10
Library functions only (most applicable questions)	270	108	0.6 Hour	64.8 hours	$1,805.98
Total	420	168		94.8 hours	$2,642.08

Notes:
(1) The earlier ATALM survey was administered to organizations that were already familiar with

*the organization and had a 32% response rate. The **_expectation of a 40% response rate_** is based on the specific administration to prior grant recipients combined with the organizational support of ATALM. Though possibly optimistic in light of current trends of declining response rates, this permits a relatively liberal estimate of potential cost to respondents.*
(2) Cost is based on average of Museum and Library Professionals of $27.87/hour, IMLS 2017 OMB Generic Clearance.

A.13.   Estimates of Cost

<u>Staff time</u>: Approximately 94.8 staff hours will be spent completing the survey based on the estimates derived from the survey pre-tests. Using the average salary for Museum and Library Professionals of $27.87 (based on the Bureau of Labor Statistics) the 94.8 hours of time is equivalent to $2,642 (wages only, benefits and overhead not included). Additional ATALM and subcontractor staff time is estimated at $68,000 for survey preparation, administration, data analysis and report writing.

<u>Equipment, software or services</u>: This survey does not require respondents to purchase equipment, software, or services beyond those normally used in cultural centers or as part of customary and usual business.

<u>Record keeping or reporting costs</u>: There are no record keeping or reporting costs to the survey respondents.

A.14.   Annualized Cost to the Federal Government

The total cost to the federal government is $22,000 via a cooperative agreement with ATALM. Additionally, federal government staff cost for approximately 460 hours of labor is approximately $24,000 in wages (excluding overhead and benefits).

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

Not applicable.

A.16.   Publication Plans and Time Schedule

Table 2 summarizes key milestones relative to the OMB approval date for the 2019 survey. Once OMB approval has been secured, the survey notifications

will be sent to leaders of each tribe followed by an email to the relevant point of contact for each unit in the universe. There will be a one-month response window for the questionnaire. Data preparation, cleaning and analysis will take almost a month, with a final report published on the ATALM website within 4-5 months of OMB approval. The proposed schedule is shown in Table 2. Dates are contingent upon OMB approval of this package.

Table 2. Proposed Schedule:

Survey Work	Days after OMB approval *(Activity duration)*
Survey announcement and official request	15 days after OMB approval
Survey distribution (first email)	22 days
Reminder (second email)	29 days
Reminder (third email)	36 days
Phone calls to non-respondents	37-45 days *(One week)*
Reminder (fourth/final email)	46 days
Survey due date	47 days *(Survey in field for 30 days)*
Data cleaning and preparation	48 - 55 days *(One week)*
Data analysis	56 – 70 days *(Two weeks)*
Report writing and review	71 days – 110 days *(~5-6 weeks)*
Report released online	145 days

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 ATALM 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," apply to the ATALM Survey.