

A. Justification: 2019-2021 IMLS Grants to States Program “State Reporting System” (3137-0071)

1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests an approval of a new three year clearance for the agency’s information collection requests for the State Reporting System for the Grants to States Program under the Paperwork Reduction Act (PRA).

Each State Library Administrative Agency (SLAA) is required, under 20 U.S.C. 9101 *et seq.* (in particular 20 U.S.C. 9134), to submit a plan that details library services goals for a five-year period. Pursuant to 20 U.S.C. 9134 (c), each SLAA that receives an IMLS grant under the G2S program is required to evaluate and report on all funded project activities to IMLS, prior to the end of its five-year plan. Each SLAA receives IMLS funding to support the five-year period through a series of overlapping two-year grant awards. Each SLAA must file interim and final financial reports, as well as final performance reports for each of these two-year grants through IMLS’s SPR system. These updated forms, were approved by OMB on 10/31/2017, and are now being submitted for the new three year approval.

In addition, several new questions related to performance measures to enhance the reporting in the SPR of the two-year grants previously approved are included in this request for approval. The SPR’s utility as an accountability tool will be enhanced by introducing performance measures to the system to project participants’ outcomes when attribution claims are defensible based on a combination of the project’s activity mode and beneficiary type.

2. Purposes and Uses of the Data

The SPR currently gathers descriptive information from SLAAs about the project inputs (e.g., budget categories), activities, outputs and narrative fields for describing other results. These administrative data are used for IMLS program planning, GPRA/PAR and other reporting with the Administration and Congress. The requested addition of performance measure questions introduce reporting on a limited set of standardized beneficiary outcomes aligned with formula grant requirements. This reporting will allow IMLS and its State partners to use the outcome data to better understand the effectiveness of the funded projects, to improve accountability, and to identify promising practices based on outcome data for broader dissemination across the library sector.

3. Use of Information Technology

IMLS is committed to the use of information technology to improve the efficiency and effectiveness of its programs while reducing burden on SLAA grantees. The SPR online reporting system is specifically designed for relevance and ease of use.

4. Efforts to Identify Duplication

IMLS and its SLAA partners started a planning process in 2011 to revamp the G2S’ approach to annual project reporting. Dozens of meetings were held in which various teams of IMLS

program staff and SLAA partner staff cooperatively developed a logic framework centered on 13 national objectives, each with associated descriptive and outcome metrics for characterizing the funded G2S projects in alignment with priorities specified in IMLS's statute (20 U.S.C. 9141).

After IMLS and SLAA participants constructed the logic framework, IMLS subsequently verified its key elements through review of the social scientific literature and feedback from peer evaluators. IMLS further presented the proposed reporting framework in a memorandum sent to OMB on October 1, 2014.

IMLS obtained the services of a contractor in 2013 to build a web portal to implement the new reporting framework. The first portion of the SPR, which was approved by OMB and implemented immediately thereafter, included descriptive metrics (e.g., project inputs, activities, and outputs). This final proposed reporting change will implement outcome metrics consistent with the full logic framework.

The SPR was designed with explicit consideration of four other major federal statistical collections – (1) the Public Library Survey (PLS) annually administered by IMLS, (2) the SLAA Survey biennially administered by IMLS, (3) the Integrated Postsecondary Education Data System (IPEDS) administered by the U.S. Department of Education, and (4) Common Core of Data (CCD) administered by the U.S. Department of Education. The SPR contains identifier fields that map each project to each of these four data collections to facilitate the use of these other federal collections, thereby enhancing the utility of the SPR's unique administrative data set.

The last approval from OMB updated the State Progress Reports (SPR) Instructions and User Guides. These instructions include updated instructions language clarifications based on user experience, for system functionality in data elements like email and phone numbers, and financial reporting.

IMLS additionally has worked closely with members of Project Outcome, a performance measurement effort of the Association of Public Libraries that is operating in all 50 States and the District of Columbia, to help ensure that there is no duplication of effort for public libraries that comprise the largest sub-recipients in the G2S Program. These proposed performance outcome measures for the SPR also closely correspond with those already required of grantees in IMLS discretionary programs in complying with performance reporting requirements under the Uniform Guidance (2 CFR part 200).

5. Method Used to Minimize Burden on Small Businesses

Not applicable.

6. Consequences of Less Frequent Data Collection

These collections of information are essential to IMLS in meeting its statutory mission under 20 U.S.C. 9101 *et seq.* The information collected by the SPR is necessary to support IMLS in prudently expending its appropriations, monitoring the progress of award completion, and

meeting its PAR reporting requirements. The information collected from grant recipients is subject to annual variations and must be collected anew for each grant cycle.

7. Special Circumstances

None of the listed conditions applies.

8. Consultations Outside the Agency

The 60-day notice for this collection was published in the Federal Register February 28, 2018 (83 FR 8711). A 30-day notice requesting comment for this clearance was published in the Federal Register on April 17, 2018 (83 FR 18597).

Agency staff consults informally with its communities throughout the year, including regular meetings with professional staff and the chief executive officers of SLAAs.

9. Payments or Gifts to Respondents

No payments or gifts are provided to any of the respondents.

10. Assurance of Confidentiality

The identities of survey respondents for the performance outcomes questions will not be reported in the SPR. Grantees will only provide aggregate data about project beneficiaries. In the event that a project has fewer than five survey participants, this information is not to be shared on SPR's public portal.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Hour Burden to Respondents

The affected public for this data collection are the State Library Administrative Agencies (SLAAs), who number 56 respondents currently, with the Freely Associated States being added to the system by approximately 2020 so the burden estimate has increased proportionally. The estimated average burden per overall response is 47.83 hours. The total estimated total annual burden is 2822 hours. The total annual costs are \$82,429.73.

Based on reporting done in the SPR for FY 2015 (the most recent year of approved data), the total estimated hourly burden for SLAA grantees to report the new four performance measures into the SPR equates to an additional 31.53 minutes (0.53 hours) or about 1.89 percent increase in the total time for an SLAA grantee to enter all data about the project into the SPR.

Average Estimates based on FY 2015 SPR System Data

# Projects/ SLAA	# Projects/SLAA w/ Outcome Reporting	Current Burden/SLAA	Estimated New Burden/SLAA	% Net Change
27.98	15.76	28.00 hours	28.53 hours/ SLAA	1.89% percent increase

13. Estimate of Cost Burden to Respondents

The total estimated extra burden annual cost burden to respondents for the new performance measures equals \$861.69, which is included in the total outlined above.

14. Estimate of Costs to Federal Government

The total estimated annual cost burden to the Federal Government equals \$1,413.98 to analyze the performance data.

15. Explanation of Change in Burden

The traditional burden for the administration of the SPR will remain the same as in the last approval in October 2017. The proposed expansion of SPR to accept several new data fields associated with performance outcomes only applies when an attribution claim is defensible based on the project's activity and beneficiary. Based on FY 2015 data, approximately 56% of 1,539 total projects would input outcome data from surveys of their beneficiaries. The surveys are external to the SPR system; grantees will enter results aggregated from participant surveys into the system. Based on a benchmark with Project Outcome, it is estimated that each grantee will require two minutes to enter these aggregate data for each such project into the SPR. This corresponds to an increase of about 32 minutes or 1.9 percent increase in total reporting burden for SLAA grantees.

16. Statistical Usage

This is a non-statistical administrative collection. However, the data in the SPR is used for analysis and reporting in addition to serving as the administrative reporting portal for the G2S program.

17. Request to Not Display Expiration Date

Not applicable. The expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.