

# Guidelines for Grants to States Program Five-Year Evaluations

## 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 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 libraries and 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 2018-2022 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.

## **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**

### **A.2.a**

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 February 4, 2019, 84 FR 1518.

IMLS published a notice in the *Federal Register* on April 22, 2019, 84 FR 16698 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 2018 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 \$148,361. 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 (59).

<u>Survey</u>	<u>Number of respondents</u>	<u>Estimated response time*</u>	<u>Total burden hours</u>
SLAA	50 States, DC, PR, VI, AS, Guam	90 hours	5310

## **46A.13. Estimates of Cost**

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

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

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

The change in the burden was due to the change in the number of respondents from 55 to 59, with the addition of the Pacific Islands and Freely Associated States to the Grants to States Program.

## **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 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,” apply to the **Guidelines for Grants to States Program Five-Year Evaluations**.