

IMLS GENERIC CLEARANCE TO CONDUCT PRE-TESTING OF SURVEYS

Supporting Statement Part A: Justification

1. Importance of Information

This is a request to renew a generic clearance for the Institute of Museum and Library Services (IMLS) that allows IMLS to develop, test, and improve its surveys and methodologies. The procedures utilized to this effect include but are not limited to tests of various types of survey operations, focus groups, cognitive interviews and laboratory activities, respondent debriefing questionnaires, field tests, pilot testing, exploratory interviews, experiments with questionnaire design, and usability testing of electronic data collection instruments.

This generic testing clearance is a helpful vehicle for evaluating quantitative and qualitative data collection instruments and various data collection procedures. It will allow IMLS to take advantage of a variety of methods to identify quantitative and qualitative data collection instruments and procedural problems, suggest solutions, and measure the relative effectiveness of alternative solutions. Using these techniques IMLS will strive to simplify quantitative and qualitative data collection instruments for respondents, reduce respondent burden, and increase the quality of the quantitative and qualitative data collection instruments used in continuing research. Thus, with the potential to increase respondent comprehension of questions and use of data collection tools, an increase in the quality of the data collected through these surveys would be achieved as well.

During the three-year generic clearance and depending on the methodological need, IMLS may administer various methodological testing activities, which may include cognitive testing of new quantitative and qualitative data collection items or instruments, field tests including split sample experiments in multiple panels, and usability testing of electronic data collection or dissemination instruments. The focus of these activities will include testing of items and research about one-off/topical surveys, as well as other methodologies of creating, administering, or disseminating results from quantitative and qualitative data collection instruments.

IMLS will rely on the following authorizing statute for data collections submitted under this generic clearance with each generic Information Collection (IC) submission to OMB:

- Section 9108 of the Museum and Library Services Act of 2018 provides general legislative authority for the planned data collection. This section authorizes policy research, data collection, analysis and modeling, evaluation, and dissemination of information. 20 U.S.C. § 9108.

The specific methods proposed for coverage by this clearance are described in Part B.

Procedures for Clearance

Before a testing activity is undertaken, IMLS will provide OMB with a memo describing the purpose of the study to be conducted, the sampling approach, the study design, and a copy of

quantitative and/or qualitative data collection instruments and debriefing materials to be used. Depending on the stage of questionnaire development, this may be a printed quantitative and/or qualitative data collection instruments, a set of prototype items showing each item type to be used, and the range of topics to be covered by the quantitative and/or qualitative data collection instruments, or an interview script. When split sample experiments are conducted, either in small group sessions or as part of a field test, all quantitative and/or qualitative data collection instrument versions to be used will be provided. For a test of alternative procedures, the description and rationale for the procedures will be submitted. A brief description of the planned field activity will also be provided.

2. Purpose and Use of the Information

The information collected will be used to pre-test, evaluate, and improve the quality of quantitative and/or qualitative data collection instruments, and provide reassessments before they are conducted. None of the data collected under this clearance will be published for its own sake. Because the quantitative and/or qualitative data collection instruments being tested under this clearance are still in the process of development, the data that result from these collections are not considered official statistics of IMLS. Data will not be made public, except when included in research reports prepared for stakeholders inside and outside of IMLS. The results may also be prepared for presentations related to survey methodology at professional meetings or publications on the IMLS website and in professional journals.

3. Use of Information Technology

When the quantitative and/or qualitative data collection instruments being tested employs automated methods for its data collection, the research conducted under this submission will also use automated data collection techniques, whenever feasible. This clearance offers IMLS the opportunity to try innovative technologies that would reduce burden and increase the use of information technology.

4. Efforts to Identify Duplication

Research under this clearance does not duplicate any other quantitative and/or qualitative data collection instrument design work being done by IMLS or other federal agencies. Instead, its purpose is to stimulate additional research, which would not be done under other circumstances due to time constraints. When appropriate, this research involves collaborations with staff from museums or state library administrative agencies or other libraries to gather information on questionnaires at the state and local levels. Additionally, to the extent possible, IMLS makes use of existing information, including reviewing results of previous evaluations of survey data; however, such information is typically not sufficient to refine survey questionnaires without conducting additional research.

5. Minimizing Burden

This research will be designed as relatively small-scale data collection efforts to minimize the amount of burden required to improve quantitative and/or qualitative data collection instruments and procedures, test new ideas, and refine or improve upon positive or unclear results from other tests. The results of the research conducted under this clearance are expected to improve the methods and instruments utilized in full scale studies and thereby improve information quality while minimizing the burden to respondents.

6. Consequences of Less Frequent Collection

We expect that quantitative and/or qualitative data collection instrument development testing will allow for increased quality of the data collected in full surveys and lowered respondent burden. If this information is not collected or is collected less frequently the agency would not be able to pre-test surveys which would potentially lead to an increased burden on respondents and a reduction in data or information quality.

7. Special Circumstances

There are no special circumstances.

8. Federal Register Comments and Consultations Outside the Agency

As required by 5 CFR 1320.8(d), a 60-day Federal Register Notice was published in the Federal Register on December 18, 2023 (88 FR 87462) (Document Number 2023-27694). No comments were received under this Notice. A 30-day Federal Register notice was published in the Federal Register on February 27, 2024 (89 FR 14526) (Document Number 2024-03786).

Consultation with staff from museums and/or state library administrative agencies will include discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden. Additional efforts to consult with potential respondents to obtain their views on the availability of data, clarity of instructions, etc., may be undertaken as part of the testing that is conducted under this clearance.

9. Paying Respondents

Respondents for activities conducted in a physical or virtual laboratory (e.g. cognitive interviews and focus groups) under this clearance may receive compensation for travel and participation. This practice has proven necessary and effective in recruiting subjects to participate in such research and is also employed by other federal agencies for methodological research. If incentives need to be proposed for any research activity such as cognitive interviews and focus groups under this clearance, justification will be provided and IMLS will work closely with OMB on the incentive strategy to be employed. If a higher-level incentive is proposed for approval, a meaningful justification will be provided.

10. Assurance of Confidentiality

Participants in some of these pre-testing activities may be subject to the safeguards provided by the Privacy Act of 1974 (5 U.S.C. 552a). If any pre-testing activities are covered, the requisite information will be covered in a forthcoming System of Records Notice. All respondents who participate in research under this clearance will be informed that their participation is voluntary and that all of the information they provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law. For personal visits and telephone interviews, this information will be conveyed verbally by the interviewer, and virtual interview respondents will receive this information in writing. All participants in cognitive research will be required to provide verbal assent and sign written notification concerning the voluntary and confidential nature of their participation. IMLS will also inform respondents in writing of the need to have an OMB number. No participant direct identifiers will be maintained as part of the research under this generic clearance.

11. Justification for Sensitive Questions

Most of the questions that are included on IMLS's current establishment questionnaires are not of a sensitive nature and should not pose a problem to respondents. However, it is possible that some potentially sensitive questions may be included in questionnaires that are tested under this clearance. One of the purposes of the testing is to identify such questions, determine sources of sensitivity, and alleviate them insofar as possible before the actual survey is administered.

12. Estimate of Hour Burden

We estimate that the number of people involved in our exploratory, field test, pilot, cognitive, and focus group work will be at most 4,225 per year; the vast majority of which will be contacted as part of screening and recruitment activities preceding the actual research. Given that screening and recruitment activities are included in the burden calculations, we estimate the annual burden hours will be approximately 30 minutes per person or an annualized 2,112.5 hours overall. The total estimated respondent burden is 6,337.5 hours for the 3-year period beginning on the date of OMB approval:

Time Period	Respondents	Frequency of Response	Time per response (minutes)	Respondent burden (hours)
Year 1	4,225	1	30	2,112.5
Year 2	4,225	1	30	2,112.5
Year 3	4,225	1	30	2,112.5
Total	12,675			6,337.5

A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are

unknown at this time. However, we can project that our activities will likely include testing items, data collection modes, user experience testing, testing of various types of survey operations, cognitive interviews and laboratory activities, respondent debriefing questionnaires, expanded field tests potentially including split sample questionnaire experiments in multiple panels, exploratory interviews, re-interviews, and focus groups among respondents.

13. Estimate of Cost Burden

The estimated annual burden cost is \$67,177.50, based on an hourly mean wage of \$31.80 for 4,225 respondents. This wage rate comes from averaging the U.S. Department of Labor, Bureau of Labor Statistics, for Librarians and Media Collection Specialists (BLS category 25-4022) employed in Local Government, excluding schools and hospitals (NAICS code 999300) (<https://www.bls.gov/oes/current/oes254022.htm>) and Museum Curators (<https://www.bls.gov/oes/current/oes254012.htm>). Data are from May 2022, the latest available as of this submission.

14. Cost to Federal Government

IMLS estimates total internal staff costs of \$33,012 for activities undertaken through this clearance (\$11,004 per year for three years). We are not able to better anticipate costs for employing contractors to execute this work, which will be affected by the actual number of participants, length of interviews, and/or mode of data collections for the surveys to be conducted under this clearance.

15. Reason for Change in Burden

IMLS completed several pieces of research under 3137-0125 and found it to be very useful in optimizing its qualitative and quantitative research. The agency intends to launch its National Museum Survey in 2025 and has expanded the anticipated annual burden included under this clearance from 650 hours to 2,112.5 hours to help the agency engage in research around that effort, along with its longer standing work on research centering on the library world.

16. Project Schedule

This clearance is for developing, testing, and improving quantitative and/or qualitative data collection instruments and methodologies. Data tabulations will be used to evaluate the results of testing. The information collected in this effort will not be the primary subject of any published reports; however, information might be included as a methodological appendix or footnote in a report containing data from a larger data collection effort. The results of this research may be prepared for presentation at professional meetings or publication in professional journals. Due to the nature of this clearance, there is no definite or tentative time schedule at this point. The project schedule will be detailed in each submission under this generic collection for OMB clearance.

17. Request to Not Display Expiration Date

IMLS plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to the Certification

There are no exceptions to the certification.