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

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) 2020, FY 2021, and FY 2022. 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 2016, FY 2017, FY 2018, and FY 2019 (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 current data collection agent for IMLS), and the Library Statistics Working Group (LSWG), a steering committee that advises on IMLS' data collections. 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 survey steering committees 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 trends and developments that may impact the need for and delivery of museum, library, and information services. IMLS must also report on the 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 and disseminate information on the best practices of such programs. IMLS collects these data as authorized by its congressional mandate, the Museum and Library Services Act of 2018, as stated in 20 U.S.C. § 9108 (Policy research, data collection, analysis and modeling, evaluation, and dissemination).

20 U.S.C. Section 9108. Policy research, data collection, analysis and modeling, evaluation, and dissemination

(a) In general

The Director shall regularly support and conduct, as appropriate, policy research, data collection, analysis and modeling, evaluation, and dissemination of information to extend and improve the Nation's museum, library, and information services.

(b) Objectives

The objectives of the policy research, data collection, analysis and modeling, evaluation, and dissemination of information carried out under this section include the following:

(1) To enhance and expand the capacity of museums, libraries, and information services to anticipate, respond to, and meet the evolving needs of communities and the public, including by identifying trends and developments that may impact the need for and delivery of services.
(2) To provide information and data on the role, value, and impact of museum, library, and information resources, including the identification of trends and potential gaps in the availability and use of museum and library services by their communities and the public.
(3) To measure the effectiveness of museums, libraries, and information services throughout the United States, including the impact of Federal programs authorized under this Act.
(4) To identify indicators and outcomes that can be used to create enhancements to the efficiency and efficacy of museum, library, and information services.

(5) To promote advancement and growth in museum, library, and information services through sharing of best practices and effective strategies in order to better serve the people of the United States.

(**6)** To facilitate planning for, and building of, institutional capacity in order to improve—

(A) museum, library, and information services at the national, State, local, and regional levels; and

(B) international communications and cooperative networks.

(7) To support and enhance collaborative professional networks and consortia that use shared, meaningful, and actionable data analysis and modeling to advance museum, library, and information services and address community needs.

(c) Authority to contract and enter into other arrangements

The Director is authorized to enter into grants, contracts, cooperative agreements, and other arrangements with Federal agencies, public and private organizations, and other entities with expertise the Director determines appropriate, to further the objectives described in subsection (b) and to carry out the responsibilities under subsection (f).

(d) Consultation and Public Engagement

In carrying out subsection (a) and in furtherance of the objectives described in subsection (b), the Director—

(1) shall conduct ongoing collaboration (as determined appropriate by the Director) and consult with—

(A) State library administrative agencies; and

(B) National, State, tribal, and regional museum and library organizations; and

(2) may also collaborate or consult with—

(A) cooperative networks of geographic- or discipline-based museums and libraries; and

(B) Other applicable agencies, organizations (including international organizations), entities (including entities with expertise in the fields of data collection, analysis and modeling, and evaluation), and community stakeholders.

(e) Assistance to museums and libraries

The Director shall provide technical support and assistance (and other resources, to the extent practicable) to ensure consistency in data reporting and help the museum and library fields with meeting the objectives of this section.

(f) Dissemination

(1) In general—

Each year, the Director shall widely disseminate, as appropriate to further the objectives described in subsection (b)—

(A) the results, data, reports, findings, studies, surveys, and other information obtained under this section;

(B) the means and approaches by which the objectives described in subsection (b) were accomplished; and

(C) information regarding the manner and extent to which collaboration and consultation were conducted, as required by subsection (d).

(2) Formats to be used—

The information described in paragraph (1) shall be shared in formats that facilitate access and ease of use and are searchable.

(g) Authorization of appropriations

(1) In general

> There are authorized to be appropriated to carry out this section $3,500,000 for each of the fiscal years 2020 through 2025.
>
> (2) Availability of funds
>
> Sums appropriated under paragraph (1) for any fiscal year shall remain available for obligation until expended.

As required by 20 U.S.C. § 9108, IMLS is seeking to conduct an analysis of national trends in the availability and use of 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 are 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 was conducted annually until 2019. The PLDS was a convenience sample survey that collected data from approximately 3,000 public libraries, but the PLA decided to permanently cease collection of the PLDS after the 2019 survey.

The PLA has also conducted two surveys in the spring of 2020 specifically to collect practices related to closures and restrictions due to the Coronavirus pandemic (COVID-19). Similar to the PLDS, these surveys were opt-in sample surveys with approximately 2,500 public library respondents. The FY 2020 PLS aims to capture Coronavirus-related practices from the entire universe of approximately 9,300 public libraries in the United States, the District of Columbia, and outlying areas.

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* on July 9, 2020, Vol. 85, No, 132, page 41246, 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 2018. Response time was reported by each SDC. Response time for the FY 2018 administration ranged from 10 hours to 521 hours, with an average response time of 96.71 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 2017, 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 5,415.8 hours (96.71 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 $153,753.43. These costs were derived by multiplying the average reporting hours per respondent, by the average hourly compensation for a typical respondent ($28.39 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 $153,753.43 (5,415.8 hours total burden time multiplied by $28.39 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 2018 PLS was $805,499.35. This includes salaries and meeting expenses for IMLS ($259,536.85) and AIR ($545,962.50) 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 2020 data:

Survey mail-out	January 6, 2021
Survey due date*	Group 1: April 16, 2021 Group 2: July 23, 2021 Group 3: August 13, 2021
Edit follow-up begins	Upon survey receipt (on flow basis)
Final file released	April 2022
Report released	October 2022

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

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 apply to the PLS.