

# Public Libraries Survey (PLS) Data Collection 2024-2026 Data Collection

OMB # 3137-0074

## Supporting Statement Part A

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# A

## Justification

### 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) 2024, FY 2025, and FY 2026. 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 five territories (the Commonwealth of Puerto Rico, the United States Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands).

##### Necessity of the Information Collection

PLS is an effort among 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 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), and five members selected from relevant library associations, data users, and members of the research community.

The PLS is a voluntary survey that collects descriptive data on the universe of public libraries in the United States 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, including the Library Search and Compare Tool and PLS Benchmarking Tables, 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, the Public Library Association (PLA) and Chief Officers of State Library Agencies (COSLA) supports the development of a universe file for use in sample surveys on such topics as the 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.

Compared to the FY 2023 survey, the FY 2024 survey will include the following changes:

- Addition of 12 data elements about access to electronic materials such as, electronic books, electronic serials, electronic audio, and electronic videos. For each type of material, the survey asks about three acquisition arrangements;
  - Materials purchased by administrative entities
  - Materials purchased by via a consortium, cooperative, or other similar group at the local, regional, or state level
  - Materials provided by the state library agency or another state agency at no or minimal cost to the administrative entity
- Addition of six data elements on access to research databases and online learning platforms. For each type of material, the survey asks about three acquisition arrangements;
  - Materials purchased by administrative entities
  - Materials purchased by via a consortium, cooperative, or other similar group at the local, regional, or state level
  - Materials provided by the state library agency or another state agency at no or minimal cost to the administrative entity
- Addition of four data elements about the circulation counts of four types of electronic materials.
- Addition of one item about automatic renewals.
- Revision of seven data elements to refine/update definitions and provide more clarity for users.
- Deletion of 11 data elements, most of which related to counts of electronic materials and counts of research databases/online learning platforms, which were eliminated in favor of the 20 added data elements listed above.

The full text of the data elements for the FY 2024 PLS survey is provided in Attachment A (FY 2024 PLS Data Elements.pdf). A detailed list of changes from the FY 2023 PLS is provided in Attachment B (List of Changes). These changes replace several numeric counts with categorical questions as well as remove multiple items that are merely sums of other items, with the goal of reducing the overall reporting burden.

### **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 the Census Bureau’s 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, the PLS Web Portal, using the same functionality as the Census Bureau’s 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 process generates downloadable reports 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.

Starting with the FY 2021 round, IMLS and AIR implemented single sign-on for SDCs to access both the PLS Web Portal and a discussion forum hosted on the IMLS website using the same credentials. This improvement allows PLS respondents to share questions and answers, as well as documents, through a community of practice with each other.

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, such as the Library Search and Compare Tool and PLS Benchmarking Tables.

#### **A.4. Efforts to Identify Duplication**

The PLS is the only known administrative collection of the public library universe 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. IMLS conducted a search to identify other collections that might duplicate this data collection effort, 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. In 2020, PLA initiated a 3-year [cycle of topical surveys](#) that uses the PLS as its population frame; the PLA topics are meant to augment the PLS by providing more detail on library services than can be collected on the PLS.

The administration and analysis of these PLA surveys would not be possible without the robust universe data files provided by the PLS.

#### **A.5. Method Used to Minimize Burden on Small Businesses**

PLS data is submitted by SDCs, employees of SLAAs. There is no direct reporting involvement by small businesses on the federal PLS.

#### **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 C.F.R. § 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* August 2, 2024, Volume 89, Number 63224, Document 2024-17058, with a 60-day public comment period to announce forwarding of the information collection request to OMB for approval. The agency received and responded to one comment in response to the Notice. IMLS published a Notice in the *Federal Register* on October 16, 2024, [89FR83520 (Document Number 2024-23864)], with a 30-day public comment to OMB.

##### **A.8.2. Consultants Outside the Agency**

The annual PLS review process has robust stakeholder engagement outside the agency. Each summer, IMLS solicits proposals for changes to the survey instrument from SDCs, chief officers, researchers, and other interested parties. The LSWG reviews the proposals in the fall, and IMLS provides SDCs the opportunity to discuss the proposals with IMLS and their peers at the annual SDC meeting in the winter. AIR develops and tests survey items in the spring, engaging in cognitive interviews with library staff who would report the data to the SLAAs. LSWG-approved proposals then go to state ballot the following August, when states, as represented by their chief officers and SDCs, decide whether they would like to accept or reject the change to the PLS. As a pre-condition for validating the vote, a minimum of 45 states must submit dually signed ballots, and a minimum of two-thirds (2/3) approval (i.e., 30 of 45) of valid state ballots received is required for any given change request to be implemented by IMLS.

### **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 (a printed certificate) 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 review process.

### **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 salary and employee benefit 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 an SLAA collects on the state's survey of public libraries. The PLS data are extracted from the state's survey by the SDC and reported to IMLS on the survey web application (PLS Web Portal).

The annual time burden estimate is calculated as the average of the hours reported by SDCs on the certification form when they submit PLS data. However, there is a great deal of variability in the reported burden from state to state. The average time per response is based on results from the FY 2022 PLS administration: the response time reported by each SDC ranged from 13 hours to 830 hours, with an average response time of 138.3 hours. Estimated Total Annual Hour Burden is 7,745 hours (138.3 hours times 56 respondents [50 states, the District of Columbia, and five territories], rounded to whole hours).

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. 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 aggregate 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 territories and why the PLS has never included the burden on the public libraries that the states survey in the OMB submission.

The estimated cost of this annual data collection is based on the number of SLAA staff responsible for collecting and reporting this information to IMLS. SLAAs administer state-based surveys to the public libraries in their respective states and territories 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 \$239,701.56. These costs were derived by multiplying the average reporting hours per respondent (138.3) by the median hourly compensation for a typical respondent (\$30.95 per hour for the combined time of an SDC and a technician) by the number of projected respondents (56).

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

The Estimated Total Annual Cost Burden is \$239,701.56 (7,745 hours total burden time multiplied by \$30.95 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 2022 PLS was \$877,063.96. This includes salaries for IMLS (\$99,471.70), annual training and LSWG meetings (\$196,700) and AIR contractor support (\$580,892.26) for this annual survey.

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

The variability of reported burden may be attributable to several things, such as changes in SDCs’ methodologies for calculating burden or the lack of reliability in the responses to this item. Additionally, turnover in SLAA personnel serving as SDCs may lead to responses to this question varying dramatically from year to year even for the same state. Over the last four cycles (FY 2019 – 2022), 33 states experienced at least one instance of SDC turnover, while some experienced as many as three.

Average reported burden increased in the FY 2021 and FY 2022 administrations due to the implementation of a new, disaggregated reporting schema for library programs and attendance. Totals and two subsets for these items have been collected in the PLS for decades, but more granular data for these items is needed to demonstrate the changing nature of library services. The FY 2023 administration, currently being fielded, did not add any new items and removed 10 items related to COVID-19. As noted in Section A.2, the FY 2024 administration will include the addition of 19 categorical items and the removal of 11 numeric items related to electronic materials. IMLS anticipates that these changes may minimally increase reporting burden for FY 2024 but will reduce reporting burden for future administrations.

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]), (3) Library Search and Compare Tool, (4) PLS Benchmarking Tables developed for the FY 2021 PLS data to replace the static supplementary tables in PDF that show state level and population size served-level analyses, and (5) a summary report of findings (in PDF). These are all published for the public on the IMLS website.

The PLS will follow this proposed schedule for the collection of FY 2024 data:

Survey invitation	January 8, 2025
Survey due date*	Group 1: April 11, 2025 Group 2: July 18, 2025 Group 3: August 8, 2025
Edit follow-up begins	Upon survey receipt (on flow basis)
Final file released	May 2026
Search and Compare Tool and PLS Benchmarking Tables	June 2026

updated	
Report released	October 2026

\*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 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.