

POLICY AND PROCEDURES FOR REVIEW OF PLS DATA ELEMENTS

Effective: January 27, 2022

I. Introduction

The purpose of this policy and procedures document is to provide guidance to the Institute of Museum and Library Services (IMLS) and its Library Statistics Working Group (LSWG) about how to change, remove, or update data elements and introduce concepts that would lead to the creation of new data elements, “change requests,” to the annual Public Libraries Survey (PLS) instrument. The annual PLS collects administrative data from the universe of approximately 9,300 public libraries with about 17,000 individual public library outlets in the 50 states, the District of Columbia, and the outlying territories. The intent of any change request would be to advance the relevance, accuracy, or timeliness of the PLS data collection instrument.

II. Definitions

Change Request: A “change request” refers to any suggestion for revising, deleting, or adding to PLS elements. More specifically:

- Revision to an existing data element, definition, or related instruction
- Deletion of an existing data element or instruction
- Addition of a concept that would lead to the creation of a new data element and instruction

Concept: A “concept” is a topic or idea about a library activity or service. For example, a concept could be a request to collect information about programming or gather more granular data about circulation. A concept, if accepted, then would be developed to construct one or more new data elements.

Data Element: A “data element” is the specific question within the PLS survey instrument. Examples include but are not limited to “Phone,” “Public Service Hours Per Year,” or “Circulation of Children’s Materials.” Data elements are identified by item numbers and variable names (e.g., Circulation of Children’s Material’s variable name and item number are KIDCIRCL and #551).

Data Element Construction: “Data element construction” is the process by which a concept is reviewed, developed into a potential data element, and tested. For example, if the LSWG agrees to accept a request to advance a concept for addition to the PLS, the process of data element construction will need to occur in order to develop the concept into a new data element.

Ineligible Change Requests: Ineligible change requests may include change requests that:

- IMLS does not have the authority to make,
- Do not align with the intent of the PLS, or
- Are not financially or logistically feasible to implement.

III. Key Stakeholders

The stakeholders below will engage with PLS change requests:

- Library Statistics Working Group (LSWG)
- Institute of Museum and Library Services (IMLS)
- State Library Chief Officers (SLC)
- State Data Coordinators (SDC)
- IMLS's Contracted Data Collection and Survey Methodology Agent(s) (currently AIR)

IV. Requirements for Change Request Submissions, Review and Voting

Change Request Submission Requirements

- 1) IMLS will commence the annual solicitation for change requests on the first Monday of August. The open period for submitting change requests is 30 days from IMLS's notification. All change requests must be submitted to the designated portal (currently GitHub). Change request submissions can be made by SDCs, SLCs, IMLS, IMLS's Contracted Data Collection Agent, or other interested parties, and must include the following information:
 - Description of the change request,
 - Justification for the change request,
 - Potential methodological issues related to the change (e.g., data unreliability/bias, potential data collection challenges), if known, and
 - Information about whether the data element is being collected elsewhere.

Data Element Development Process and Reviewer Requirements

- 2) At least five (5) business days in advance of the fall LSWG meeting, IMLS will preliminarily review all change requests, remove any ineligible change requests, and circulate via email the remaining change requests to the LSWG and the SLCs/SDCs for their review.
- 3) At its fall meeting on or around October 1, the LSWG will determine by majority vote whether each change request should proceed to the next phase of assessment, including, if necessary, development and testing. In consultation with IMLS, LSWG may determine a technical change request to be minor enough, e.g., punctuation change, to advance to a final vote without sub-committee review.
- 4) At the fall LSWG meeting, members will be asked to form a volunteer sub-committee to work with IMLS's Contracted Data Collection Agent(s) to develop the concepts into data elements. The sub-committee must consist of a minimum of seven (7) LSWG members, the makeup of which must have at least two (2) SLCs, two (2) SDCs, one (1) researcher, IMLS's Contracted Data Collection Agent, and one (1) IMLS staff person. The LSWG will determine at the time the sub-committee is formed whether a survey methodologist or other subject matter expert be needed considering the nature of the change requests made.
- 5) Between the fall and summer LSWG meetings from October to July the volunteer sub-committee will meet to review the change requests. The sub-committee will communicate progress updates to the SDCs/SLCs, as well as seek input on the relevancy and feasibility of the change requests, including the degree to which the change request adds value to the PLS.

- 6) At least three (3) business days in advance of the summer LSWG meeting, to take place on or about July 15, the sub-committee will circulate via email to the LSWG a reporting of its review and the resulting data element(s) it developed, including results of cognitive testing or other methodological pre-testing performed.
- 7) At the summer LSWG meeting, the sub-committee will present recommendations as to whether the LSWG should advance the change request for a State/Territory vote.

LSWG & SLC/SDC Voting Requirements

- 8) At its summer meeting, LSWG then will determine by majority vote whether to approve the sub-committee's recommendation(s) and advance each change forward for State/Territory vote.
 - Each LSWG member has one vote to cast (excluding IMLS).
 - A simple majority vote is required for a change submission to proceed to State/Territory vote.
- 9) Within one month of the summer LSWG meeting, IMLS will circulate to the States/Territories the results of the LSWG vote along with a ballot for State/Territory vote.
- 10) After the ballots have been circulated, the voting period will be open for 30 days. For any State/Territory ballot to be valid for submission, it must be signed by both the SLC and SDC.
- 11) The State/Territory voting thresholds necessary for a change request to be approved involve two requirements:
 - As a pre-condition for validating the vote, a minimum of 45 States and Territories must submit dually signed ballots, and
 - A minimum of two-thirds (2/3) approval (e.g., 30 of 45) of valid State and Territory ballots received is required for any given change request to be approved by IMLS.

Notification of Decision/Implementation

- 12) On behalf of the LSWG, IMLS will provide notice of the voting results via email to all SDCs, SLCs and LSWG members and via posting on various SDC and COSLA communications avenues, such as email and existing listservs. IMLS then will advance the necessary documentation to OMB for review and clearance.
- 13) Upon OMB approval, IMLS will coordinate with the SDCs, SLCs and LSWG to implement the change, including but not limited to amending the PLS instrument itself, communicating the change(s) to relevant stakeholders, and supporting training needs to ensure successful reporting in connection with the change(s).

V. Timeline and Process

Timeline	Process
First Monday in August	IMLS will open the solicitation window for change request proposals from all State Library Chief Officers (SLCs), State Data Coordinators (SDCs), or other interested parties.
30 days after solicitation opens	Change request submissions due.
5 days prior to fall LSWG Meeting	IMLS will provide LSWG members and SLCs/SDCs with information on all submitted change requests.
Fall LSWG Meeting	IMLS will present the change request list and feedback from SLCs/SDCs obtained during the solicitation period to LSWG. LSWG will develop volunteer sub-committees and advance eligible change requests to the review stage.
October - July	Sub-committee review period. Interim findings or questions to help with the review and/or data element development process may be presented at either the winter or spring LSWG meetings. Sub-committee may seek input from SLCs/SDCs or other interested parties.
Summer LSWG Meeting	The sub-committee will present recommendations based on October-July activities to the LSWG. LSWG will vote on which ones to advance to State/Territory vote.
August (estimated 30 days after LSWG summer Meeting)	Voting in States and Territories opens.
Approximately seven (7) days prior to the States' voting deadline	IMLS will inform LSWG and the COSLA representative of which States have not yet voted on PLS proposed changes. IMLS will coordinate with LSWG members and the COSLA representative to contact those States which have not yet voted.
August/September	States and Territories voting period closes. Voting will close by 11:59 pm SST on the night of the voting deadline; all votes received by that deadline will be counted.
Fall LSWG meeting	LSWG reviews vote results at LSWG Meeting.
October	IMLS notifies of SLCs/SDCs of results. IMLS begins preparation of the final PRA package to submit to OMB for approval.
Winter meetings	IMLS releases new data elements.
January/12 months later	IMLS opens PLS Collection with approved change requests.