A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating the collection of information.

The Institute of Museum and Library services (IMLS) is required by the Library Services and Technology Act "to stimulate excellence and promote access to learning and information resources in all types of libraries for individuals of all ages;" "to promote library services that provide all users access to information through State, regional, national and international electronic networks;" and "to provide linkages among and between libraries." (PL 104-208 as amended, title VII, Subtitle B, Sec. 212).

Information science researchers have developed the Open Archives Initiative Metadata Harvesting Protocol, which provides a way to cull information about digital information resources and place it in a metadata repository that is searchable across collections and institutions. Some institutions have constructed the metadata for their on-line collections to be harvestable according to this protocol, but there has not yet been a study of a variety of institutions, academic and non-academic, large and small, to test this protocol. In addition, IMLS and the public have no way to search across the digital collections IMLS has funded, increasing the access already provided by their publication on the web. If successful, the creation of this registry and the developing of the OAI harvestable metadata repository will demonstrate the feasibility of this approach and could lead to future interoperability with the National Science Digital Library and other collaborative efforts.

In September 2002 IMLS announced a National Leadership Grant award to the University of Illinois at Urbana Champaign (UIUC) for a research project to determine the feasibility of using the Open Archives Initiative (OAI) metadata harvesting protocol to aggregate and provide integrated item-level search access to the digitization projects funded by IMLS through the National Leadership Grant (NLG) program. The project includes NLG digitization grants for libraries, museums, and library and museum collaborations funded since 1998 and continuing through 2005. In addition, UIUC has lead a community effort to develop a collection-level registry of digitization projects that will be searchable from the IMLS Web site. In order to do this, UIUC uses various methods to gather information about metadata use, practices, and expectations of grantees such as surveys, interviews, and focus groups. IMLS awarded an $352,983 to extend the project and conduct additional research.

This request is to add 50 additional respondents to Survey I, NLG Project Collection Information, to update and add technical information about the metadata and systems the IMLS funded projects used. A second survey approved in the original clearance 3137-0051 will not be repeated for these additional respondents. These 50 respondents will be asked later to complete the Entry/Edit form (OMB 31137-0055, expires 11/30/2007) – a change request to add these respondents to this data collection will be submitted separately.

IMLS will not have access to the original response data linked to specific respondents. This is intended to protect the privacy of specific respondents and prevent any possible perceived funding consequences to their answers.

Note: IMLS required UIUC to form a Steering Committee, members subject to IMLS approval. The purpose of this committee is to ensure that the library and museum communities are adequately represented in this study and to participate with the project team and interested participants in developing standards for the content of the registry record.

The survey to be completed by the 50 new respondents is on line at:
http://imlsdcc.grainger.uiuc.edu/survey/SurveyOneInstruction.htm
login: IMLS
password: digcoll

The introductory information has been updated and adapted for the web presentation.

A copy of the e-mail that will be sent to the 50 new respondents to notify them of the survey is attached to this information collection request as a supporting document.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.
The purpose of the research is to identify for IMLS the best practices for interoperability and to provide training and tools, if appropriate, to assist projects in making any necessary enhancements to their data to enable aggregation. In the first stage of the project, UIUC assesses each project's capability and interest in participating in the community that will develop recommendations regarding collection-level description, best practices for interoperability, and/or participate in metadata conversion or enhancement. The data from Survey 1, NLG Project and Collection Information, was used during the testing phase by IMLS for informational purposes, by researchers at UIUC, and by participating NLG projects. IMLS provides public access to the collection registry by a link from its Digital Corner page on its website to the UIUC project website.

2. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**
IMLS digitization project grantees from 2005 and 2006 and select state level Library Services and Technology Act (LSTA) grantees (the 50 new respondents) will be sent an e-mail (attached) notifying them of the project and giving them the URL of the on-line survey form to be submitted electronically. The website will have an instructional letter.

3. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2.**
   Sometimes pieces of the information from questions 1 through 7 exist in the grant documents; however pre-filling-in of these items in the easy, web-based survey form would require an additional layer of control that would be inconvenient for the respondent and could cause confusion. Allowing the respondents to answer these questions quickly rather than review and verify pre-filled-in data is faster and easier.

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4. **If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.** While the collection will include small non-profit organizations, no significant impact is expected. The filling out by the research team of Survey I information from public websites and IMLS grant files should reduce the time it takes for participants to answer the survey.

5. **Describe the consequences to Federal program or policy activities if the collection is not conducted less frequently, as well as any technical or legal obstacles to reducing burden.**
   It is anticipated that this survey will be conducted only once for each grantee.

6. **Explain any special circumstances that require the collection to be conducted in a manner**
   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   - **requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it was institute procedures to protect the information's confidentiality to the extent permitted by law.**
   - N/A

7. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by**

5DFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

The Federal Register notice for this collection was published December 1, 2006, Vol. 71, No. 231, page69598.

8. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contracts or grantees.**

   N/A

9. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

   Information collected by Survey I will be used by IMLS for informational purposes related to its programs involving digitization of collections. IMLS will have access to reports summarizing the data or providing information not identifiable to any individual respondent.

10. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

   IMLS does not collect sensitive information from grant applicants. Any research projects funded by IMLS under this program is subject to federal statutes and regulations governing research on human subjects. On March 21, 2003, the University of Illinois, Urbana-Champaign's Institutional Research Board Office assessed the surveys for this project as having no significant risk for participants. The Office also waived review by the full board.

11. **Provide estimates of the hour burden of the collection of information. The statement should:**

   - **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is**

desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If the request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-i.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

IMLS estimates the following burden for collection of this information from Survey I:
Estimated number of respondents: 50 (2005 and 2006 National Leadership Grantees and LSTA grantees)
Frequency of response: one time
Estimated time per respondent: 30 minutes
Estimated cost per respondent: $12.50 (30 min x $25 per hour)
Estimate based on: IUIC research team estimate

Estimated total burden of Survey 1: 25 hours, $625
Estimate based on: IUIC research team estimate

12. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software, monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Recordkeeping burden for respondents caused by these data collections: None. Data will come from records maintained for respondents' ongoing administrative purposes and from knowledge of the participants.

14. **Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred with the collection of information. Agencies may also aggregate cost estimates from paragraphs 12, 13, and 14 in a single table.**
These data collections are part of IMLS Cooperative Agreement LG-02-02-0281, $499,440 to UIUC for three years. Additional funding for this project awarded in 2005 was $352,983 covering all project activities. Initial estimate for administration of Survey 1 to the additional 50 respondents is $225.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-i.

Not applicable

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.
The notice to the 50 respondents will be sent out in January 2007. The entire project is currently scheduled to end September 30, 2007.

17. If seeking approval to not display the expiration date for OMB approval of the information, explain the reasons that display would be inappropriate.

Not applicable

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I).

Not applicable.