

1 Supporting Statement A

Department of the Interior Collection of Information Package: Documenting, Managing and Preserving Department of the Interior Museum Property Housed in Non-Federal Repositories

OMB Control Number 1084-0034

Note: Throughout this document, the term “Department of the Interior” or its acronym “DOI” is used to refer to both the Department of the Interior and all of its subsidiary bureaus, such as the Bureau of Indian Affairs, Bureau of Land Management, Bureau of Reclamation, National Park Service, and U.S. Fish and Wildlife Service.

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked “Yes,” then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Department of the Interior (DOI) manages an estimated 74 million objects and scientific specimens, and over 91,000 linear feet of archives in trust for the American public. This diverse collection consists of archaeological artifacts, archives, biological specimens, ethnographic objects, fine arts, geological specimens, historic objects, and paleontological specimens that are held by the Department’s bureaus and offices (bureaus).

This information collection request is directed to non-Federal repositories that house DOI museum collections. The information that DOI obtains, on a voluntary basis, concerns DOI museum collections held at non-Federal repositories. Receipt of this information supports the Department's management of its museum collections for public benefit, including preservation, protection, access, and use, as well as where applicable, compliance with the Native American Graves Protection and Repatriation Act (NAGPRA).

The information that DOI seeks consists of the following:

- A. Catalog Records and associated files describing the objects and their use;
- B. Accession Records and associated files regarding acquisition;
- C. Facility Checklist for Spaces Housing DOI Museum Property (Checklist), which addresses the environmental, security, and other management controls in place to document and safeguard the collections;
- D. Inventory of Museum Collections (Inventory) documenting presence and condition of objects and records; and
- E. Input on Collections from Lands Administered by the U.S. Department of the Interior that are Located at Non-Federal Facilities (Input Form) to query a limited range of information about the repository, the scope and types of DOI collections in repositories, with which bureaus and offices those collections are associated and the nature of agreements, the status of documentation and NAGPRA compliance, and availability for research and use.

Although the majority of DOI's documented collections are housed in bureau facilities across the nation, at least 10 percent are located at approximately 970 non-Federal repositories, primarily state, tribal, and local museums and university departments. Most of the DOI museum artifacts, specimens, and archives housed in non-Federal repositories resulted from projects on Federal lands, and include collections from the disciplines of archaeology, biology, geology, and paleontology, as well as associated project documentation.

DOI museum objects cared for in non-Federal repositories are those artifacts, specimens, and archives that are established as Federal property under Federal law. Common law also confers rights to landowners, including the Federal government, such as ownership of property, resources, and other tangible assets existing on or originating from those lands, unless those rights were previously relinquished, sold, awarded, or otherwise reassigned. Also, permits and other agreements for the collection of artifacts and specimens from public lands managed at the time by the Department further affirm Federal ownership. In order to maintain accountability of and facilitate access to DOI museum objects, the objects must be documented in the Interior Collection Management System (ICMS), its successor, the Museum Collection Management System (MCMS), or in another collection management database from which the necessary data can be imported into ICMS or MCMS.

Federal regulations and DOI policy require that all permittees conducting authorized scientific research and authorized individuals performing compliance activities on DOI-managed lands must ensure that any retained museum specimens or objects collected during a project are: 1) Accessioned and cataloged in ICMS/MCMS, according to DOI standards; and 2) housed in an appropriate museum repository that meets DOI museum standards. These requirements ensure the collections' long-term preservation, protection, and accessibility for access and use.

Some of the research and compliance projects conducted prior to the mid-1970s, however, were undertaken in absence of formal research permits or other documentation. Likewise, loan or repository agreements, receipts for property, memoranda of agreement, instruments of conveyance, or other standard museum documentation may not have been prepared regarding any objects or specimens collected during the project. Such documentation is vital to ensure that all parties are aware of:

- 1) Federal responsibilities pertaining to certain collections, as established in law by the Monuments, Ruins, Sites, and Objects of Antiquity (Act for the Preservation of American Antiquities of 1906) ("Antiquities Act") (54 U.S.C. §§ 320301-320303).
- 2) Permanent Federal ownership of collections, as established in:
 - Common law.
 - Federal legislation, including the National Park Service Organic Act of 1916 (54 USC § 100101); Historic Sites Act of 1935 (54 USC §§ 102303-4; 320101 et seq.); Management of Museum Properties Act of 1955, as amended (54 USC §§ 102501-4); Archaeological Resources Protection Act of 1979, as amended (16 USC §§ 470aa-mm); Paleontological Resources Preservation Act (16 USC §§ 470aaa-470aaa-11); and other legislation.
 - Federal regulations and directives, including Curation of Federally-Owned and Administered Archaeological Collections (36 CFR Part 79); the Federal Management Regulation (41 CFR Part 102; successor regulation to the Federal Property Management Regulation); Interior Property Management Directives; Departmental Manual Part 411, Identifying and Managing Museum Property; and DOI Museum Property Directives.
- 3) The mandated documentation and preservation responsibilities of the researcher, her/his institution, and the repository where the collections were ultimately housed.

- 4) Instances in which DOI museum collections may have been accessioned into the permanent collections of some non-Federal repositories, if those institutions presumed ownership rights.

The Department is required to collect, use, and retain this information in support of management of DOI museum collections by the following Federal laws, regulations, and directives:

- Antiquities Act (54 USC §§ 320301-320303);
- National Park Service Organic Act of 1916 (54 USC § 100101);
- Historic Sites Act of 1935 (54 USC §§ 102303-4; 320101 et seq.);
- Federal Property and Administrative Services Act of 1949 as amended, (40 USC § 524);
- Management of Museum Properties Act of 1955, as amended (54 USC §§ 102501-4);
- National Historic Preservation Act of 1966, as amended (54 USC §§ 300101 et seq.);
- Archeological and Historic Preservation Act of 1974, as amended (54 USC §§ 312501 et seq.);
- Archaeological Resources Protection Act of 1979, as amended (16 USC §§ 470aa-mm);
- Native American Graves Protection and Repatriation Act of 1990 (25 USC §§ 3001-3013);
- Paleontological Resources Preservation Act (16 USC §§ 470aaa-470aaa-11);
- Curation of Federally-Owned and Administered Archaeological Collections (36 CFR Part 79);
- Native American Graves Protection and Repatriation Act Regulations (43 CFR Part 10); and
- Federal Management Regulation, Subchapter B: Personal Property (41 CFR Part 102).

The Department of the Interior implements these laws, regulations, and directives using the following Departmental policies and findings:

- Department of the Interior, Departmental Manual;
 - o Part 410: Personal Property Management
 - o Part 411: Identifying and Managing Museum Property (411 DM)
- DOI Museum Property Directives (implements DOI museum policy per 411 DM); and
- FY 2010 Office of Inspector General (OIG) report, *Department of the Interior, Museum Collections: Accountability and Preservation* (C-IN-MOA-0010-2008).
 - o Included 13 recommendations for improving museum collections management, preservation, and accountability

Finally, as a public steward and advocate of collaborative methods for resource

preservation (including museum collections), DOI is committed to meeting accepted U.S. museum standards as promulgated by the American Alliance of Museums' (AAM) *National Standards and Best Practices for U.S. Museums*.

- 2. 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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

DOI is seeking information from non-Federal repositories, on a voluntary basis, concerning DOI museum collections that are, or may be, located in those non-Federal repositories. The collection of this information is essential for the Department to uphold its museum management responsibilities as mandated by Federal law, regulations, and Departmental requirements. While the examples provided in A., B., and C. (below) demonstrate the information that DOI hopes to collect, DOI accepts the data in any format (spreadsheet, CSV, etc.) that is most convenient to the institution providing it, in order to minimize the burden on the public. For D. and E. (below), specific collection instruments are provided to collect the information. The information consists of the following:

- A. Catalog Records:** Catalog records document the cataloging of every museum object under the stewardship of the Department. Cataloging is the action of assigning a unique identifying catalog number to an object or group of related objects and completing descriptive documentation, including physical description, condition, provenience, location, and other pertinent information to facilitate physical and intellectual access to object(s) and the collections.

Catalog records are the primary property accountability records for museum objects. They also provide critical access to information about museum collections for research, education, and resources management. The information on the catalog records may be as important as the objects themselves. All objects, specimens, and archives in DOI museum collections must be cataloged and included in ICMS/MCMS.

DOI is interested in obtaining any catalog record information, which it currently lacks, for the DOI collections housed in non-Federal repositories. The information, which DOI is seeking on a voluntary basis from non-Federal repositories, includes the data sets listed below.

If a non-Federal repository's records do not include all of these data sets, whatever data that does exist, and which can be reasonably provided to DOI, are sufficient. If submission of any of these data is unduly burdensome (for example, if a non-Federal repository's catalog records have not been digitized), DOI works with the non-Federal repository to develop a mutually

acceptable approach for DOI to acquire the data. Any such projects are funded by DOI as resources permit.

DOI Catalog Data

The following information, which DOI must gather, record and maintain, as required by 411 DM and DOI Museum Property Directive 3, *Required Standards for Documenting Museum Property*, is requested on a voluntary basis from non-Federal repositories:

- **Accession number:** A unique accession number is assigned to every new accession to the collection. An accession is the acquisition of a single object or a group of objects from one source, under one type of transaction (for example, gift), and on one date.
- **Catalog number:** A unique catalog number is assigned to every object or group of bulk objects in a collection.
- **Discipline and classification:** Every object or group of bulk objects that is assigned a catalog number is grouped into one of eight disciplines (archaeology, archives, art, biology, ethnography, geology, history, or paleontology) and then further differentiated by subsidiary classification.
- **Object or scientific name:** All cataloged objects must be assigned an object name and all records for cataloged specimens must note the specimen's scientific name.
- **DOI unit acronym and/or identifier:** Each catalog record must identify the individual DOI unit that manages the object.
- **Controlled property status:** An object is identified as controlled property if it is: especially sensitive; of high intrinsic or scientific value; vulnerable to theft, loss, or damage; or valued at or above a certain threshold value.
- **Item count or quantity:** The number of items that are associated with a particular catalog number.
- **Current location:** The exact place where the object is located (e.g., Museum Exhibit Case 2; Storage Room, Cabinet 7, Drawer 2; or Auditorium Lobby, South Wall).
- **Description:** A detailed description of the object that includes its physical characteristics; scientific, historic, or other significance;

associations; and any other relevant information obtained from associated documentation, the donor, collector, researcher, or other subject matter experts.

- Condition: When the object is first cataloged, its condition must be noted on the catalog record. Whenever any changes in condition are observed (such as during inventory, exhibit, or analysis), the catalog record must be revised accordingly.
- Date cataloged: This is the date that the object is cataloged or recataloged following the acquisition of additional information.
- Cataloger: The name of the individual that documented, described, classified, and otherwise quantified the object's primary characteristics, condition, and significance.

See Figure 1 for an ICMS catalog record (hard copy) used to document cultural collections (archaeology, archives, art, history, and ethnography).

| | | | | |
|---|---|-----------------------------|-----------------------------|----------------------------------|
| MUSEUM CATALOG RECORD-CR | CLASSIFICATION | | OBJECT LOCATION | CONTROLLED PROPERTY |
| | HISTORY | | WYLER HOUSE DINING RM | Y |
| | FURNISHINGS | | OBJECT STATUS AND YEAR | CATALOG NUMBER |
| | FURNITURE | | EXHIBIT 1999 | PARK ACRONYM NUMBER PARK 7621 |
| | OBJECT | | ACQUISITION TYPE | ACQUISITION DATE |
| | CHAIR | | GIFT | 12/08/1998 |
| | DESCRIPTION | | ITEM COUNT | ACCESSION NUMBER |
| | MAHOGANY HEPPLEWHITE SHIELD-BACK SIDE CHAIR WITH SWELLED ORIGINAL SLIPSEAT AND MOLDED EXTERIOR FRONT LEGS. SHIELD BACK CONTAINS FIVE CHanneled VERTICAL SLATS SPRINGING FROM A LEAF CARVED AND 15 FLUTE LUNETTE, TERMINATING IN A STYLIZED LOTUS FLOWER AND CROSS-HATCHING. MARKED ON INTERIOR FRONT SEAT RAIL "IIIIV". BRASS PLATE SAYS: "THIS CHAIR BELONGED TO REV. THOMAS WYLER, FRANKLIN PRESBYTERIAN CHURCH." | | 1 | PARK-00044 |
| | SITE OF ORIGINAL COLLECTION/PROVENIENCE | | LOT QUANTIFICATION | |
| | SITE OF ORIGIN | | STORAGE UNIT | |
| HOPEWELL __ __ PA __ USA | | EA | | |
| CULTURAL IDENTITY | | OBJECT DATE | HISTORIC / CULTURAL PERIOD | |
| DIMENSIONS/WEIGHT | | 1787 --AD --CIRCA | FEDERAL | |
| H 99.1, W 54.3, D 56.0 CM __ __ __ | | PHOTO NUMBER | OTHER NUMBERS | |
| MEDIUM/MATERIALS | | 4235/13 | | |
| WOOD | | CONDITION | MAINTENANCE CYCLE | |
| IDENTIFIED BY AND DATE | | COM/GD | 1.0/1999 | |
| PARK, MALCOLM 12/08/1998 | | ARTIST/MAKER | | |
| EMINENT FIGURE ASSOCIATION | | ARTIST/MAKER | | |
| WYLER, REV. THOMAS | | ARTIST/MAKER | | |
| CATALOGER AND DATE | | VALUE AT ACQUISITION, BASIS | CURRENT VALUE, DATE, BASIS | |
| DAI, SHAN 12/10/1998 | | \$ 8000 CATALOGER | \$8000 04/08/1999 CATALOGER | |
| RESTRICTION N | REPRODUCTION N | PUBLICATION CITATION N | PRESERVATION TREATMENT Y | |
| | | | CATALOG FOLDER Y | |
| | | | SIGNIFICANCE N | |
| U.S. DEPARTMENT OF THE INTERIOR MUSEUM CATALOG RECORD - CULTURAL RESOURCES | | | | |

Figure 1: ICMS Museum Catalog Record, Cultural Resources

DOI Supplementary Catalog Data for DOI Archaeological Collections, as specified by 411 DM:

In addition to the data fields noted above, DOI requests catalog records for DOI archaeological collections to include the following data fields:

- State Site Number: The number assigned by the relevant state to the site from which the object(s) was originally recovered.
- Field Site Number: The number assigned by the investigator to the site from which the object(s) was originally recovered.
- Site Name and/or Place Name: The distinctive name of the location or place where the material was collected.
- Within-Site Provenience: The specific provenience of the object, including collection/excavation unit.
- UTM Coordinates, Latitude and Longitude, or Township/Range/Section: The specific coordinates for the site.
- County and U.S. State: The name of the county and state for which the site is located.
- Country (if outside U.S.).

DOI Supplementary Catalog Data for DOI Archives Collections, as specified by 411 DM:

In addition to the data fields noted above, DOI requests catalog records for DOI archives collections to include the following data fields:

- Collection Number (or Local Collection Number): Any identifying number that the collector assigned to the archives collection.
- Collection Title: The name of a specific archives collection.
- Date(s) Documents were created: The date (or date range) when the documents in an archives collection were created.
- Scope and Content: The types of documents that appear most frequently in an archives collection. Examples include correspondence, reports, maps, drawings, photographs, newspaper clippings, and sound recordings. It also includes a one paragraph overview of the collection that notes specific topics and highlights.
- History of the Organization or Person who created the Record Group: The background of the group (or the biography of the individual) that developed the archives collection.
- Organization and/or Arrangement: The make-up of the collection and

how the file units are arranged (alphabetically, numerically, chronologically, or according to some other filing scheme).

DOI Supplementary Catalog Data for DOI Natural History Collections, as specified by 411 DM:

In addition to the data fields noted above, DOI requests catalog records for DOI biology, geology, and paleontology specimens to include the following data fields:

- Type Specimen (if designated and appropriate to the discipline type): The specimen used to describe a new species for the first time.
- Identifier(s): The individual scientist, researcher, or other specialist who identified the specimen.
- Collecting Locality, including:
 - o Collecting locality name and/or place name.
 - o UTM coordinates, latitude and longitude, or township/range/section.
 - o Collection unit.
 - o County and U.S. State.
 - o Country (if outside U.S.).
 - o Formation (geology and paleontology only): The geological formation from which the specimen was removed.
 - o Period/system (geology and paleontology only): The third division of geologic time; named for either location or characteristics of the defining rock formations.
- Collector(s): The name(s) of the individual(s) that collected the specimen in the field.
- Collector's Number: The field number or other identifying number that the collector first assigned to the specimen.
- Collection Date: The date that the specimen was collected in the field.

- Preservative and/or Preparation: The name of any chemical compound applied to the specimen for preservation and method.

B. Accession Records: Accession records document the accessioning of every museum object under the stewardship of the Department. Accessioning is the formal, documented process to add an object or group of objects to a museum collection. A single accession transaction occurs when one or more objects are acquired in the same manner, from one source, and at one time. All objects, specimens, and archives in DOI museum collections must be accessioned and included in ICMS/MCMS.

DOI is interested in obtaining any accession record information, which it currently lacks, for all DOI collections housed in non-Federal repositories. The information, which DOI is seeking on a voluntary basis from non-Federal repositories, includes the data sets listed below.

If a non-Federal repository's records do not include all of these data sets, whatever data that does exist, and which can be reasonably provided to DOI, are sufficient. If submission of any of these data is unduly burdensome (for example, if a non-Federal repository's accession records have not been digitized), DOI works with the non-Federal repository to develop a mutually acceptable approach for DOI to acquire the data. Any such projects are funded by DOI as resources permit.

DOI Accession Data

The following information, which DOI must gather, record, and maintain, as required by 411 DM and DOI Museum Property Directive 3, *Required Standards for Documenting Museum Property*, is requested on a voluntary basis from non-Federal repositories:

- Accession Number: The number assigned to an object or group of objects.
- Source of Accession: The individual or institution that DOI received the object or collection from. Source of Accession information must include:
 - o Name of individual or institution (and responsible official).
 - o Complete address and telephone number of individual or institution (and responsible official).
- Date Received: The date the object or a group of objects was received by DOI or another institution on DOI's behalf.

C.

Figure 2: Page from a DOI Accession Book

Facility Checklist for Spaces Housing DOI Museum Property (Checklist):

The Checklist is used to evaluate exhibit and/or storage spaces that house DOI museum collections to ensure compliance with the preservation requirements specified in DOI Museum Property Directive 4, *Required Standards for Managing and Preserving Museum Property*. Per 411 DM, DOI must complete a Checklist for each bureau facility and non-Federal facility housing DOI museum property every five years, at a minimum.

To eliminate duplication, maximize efficiencies, and reduce burden, DOI bureaus or their units are not required to conduct separate Checklists when a non-Federal facility houses collections from more than one bureau and/or unit. In these instances, DOI normally coordinates its efforts Department-wide, and conducts a single Checklist that satisfies all bureaus'/units' requirements.

If a non-Federal facility that houses DOI museum collections is currently accredited by AAM, it is not required to be evaluated using the Checklist and receives a condition rating of "Good" for reporting purposes. AAM accreditation acknowledges those institutions' superior accomplishments and ongoing commitments related to preservation and educational excellence.

DOI museum management staff usually complete the Checklist. However, staff at a non-Federal repository may be asked, on a voluntary basis, to assist with the completion of a Checklist for their facility. Non-Federal repository

staff are only asked to complete the Checklist if a DOI staff member is unable to visit the facility. The Checklist is included in this ICR to allow DOI to ask for assistance with completing the Checklist.

During the Checklist evaluation, the evaluator assigns a score (ranging from 4 to 0) to each preservation element on the Checklist according to the following criteria: “4 points = No Deficiency(ies)” ; “3 points = Minor Deficiency(ies)” ; “2 points = Moderate Deficiency(ies)” ; “1 point = Major Deficiency(ies)” ; or “0 points = Fully Deficient”. If an element is not applicable to the facility, the evaluator notes this element as “N/A.” This ensures that points are not assigned to the element, and it is not included when calculating the final score for the facility.

Each Checklist element includes a “Comments” box to note observations and recommendations made during the evaluation. Comments are required for all scores less than “4 = No Deficiency(ies)” to provide a foundation for understanding the score, assisting in future evaluations, and decision making.

Once the evaluation has been completed, the score of each applicable element is tallied to produce a numerical score for the facility, which corresponds to a rating of “Good”, “Fair”, or “Poor”.

In addition to tracking compliance with DOI museum policy, the Checklist is used in a collaborative dialog among all responsible parties to: identify deficiencies/needs; develop, formulate, and prioritize corrective actions; quantify resources needed to address deficiencies/needs; provide managers with critical information for the development of strategic plans and funding requests; and report accomplishments.

DOI responded to the OIG report by revising and updating the Checklist in FY 2015.

The Checklist consists of the following elements, all of which are required in 411 DM and DOI Museum Property Directive 14, *Facility Checklist for Spaces Housing DOI Museum Property*. A justification for each element is included.

Cover Page

1. “Facility Name”

Justification: This information is requested to document the name of the non-Federal repository that houses DOI collections for proper accountability as required by 411 DM.

2. “Bureau(s) with Collection(s) in the Facility”

Justification: This information is requested to document which DOI bureau(s) have objects at the non-Federal repository for proper accountability as required by 411 DM.

3. "Facility Contact Information: Name and title; Street address; Email address; and Telephone #"

Justification: This information is requested to document the physical address and contact information for the non-Federal repository that houses DOI collections. This allows for proper accountability as required by 411 DM and facilitates future correspondence with the non-Federal repository.

4. "Checklist Completed By: Name and title; Email; and Date"

Justification: This information is requested to document the contact information for the individual that completed the Checklist (if that person is not the primary representative listed above). This allows for proper accountability as required by 411 DM and facilitates future correspondence with the appropriate staff at the non-Federal repository.

5. "AAM Information (if applicable): Accreditation Date; Accreditation Expiration Date; Provide AAM General Facility Report (if available)."

Justification: This information is requested to document if the facility is accredited by AAM. AAM accreditation is held by the nation's leading museums and acknowledges those institutions' superior accomplishments and ongoing commitments related to preservation and educational excellence. Repositories that hold AAM accreditation generally provide excellent care for DOI collections.

6. "List of Exhibit, Storage, and Administrative Office Space(s) Evaluated:"

Justification: This information is requested to document the number of locations (and type – either exhibit or storage) within the non-Federal repository where DOI collections are located. DOI does not allow non-Federal repositories to display DOI artwork their offices.

7. "Overall comments, including recommendations for improvements"

Justification: This text box is to note observations and recommendations made during the evaluation.

Core Plans

1. “The Collection Management Plan (CMP) documents the unit’s strategies in regard to the long-term management, care, and preservation of its museum collections; includes recommendations for correcting any identified deficiencies; and has been reviewed, and updated if necessary, in the last five years.”

There is a text box for the plan’s “Date Approved”.

Justification: DOI is requesting that the non-Federal repository housing DOI collections confirm if it possesses a Collection Management Plan (which is mandatory for DOI units) or its equivalent, in accordance with DOI policy and accepted U.S. museum standards.

2. “The Emergency Management Plan (EMP) identifies all of the local threats (as listed below) and must include the following requirements: 1) risk mitigation, response, and recovery for museum collections appropriate to each threat; 2) risks to the spaces, as identified by a structural fire survey; 3) appropriate staff, training, and drills; and 4) locations of all of the spaces that house collections. The EMP has been reviewed, and updated if necessary, in the last five years.

List the local threats to museum collections:

- Fire, human-caused
- Fire, naturally caused
- Flooding, human caused
- Flooding, naturally caused
- Hurricane
- Earthquake
- Tornado
- Severe windstorm
- Crime
- Civil unrest
- Other”

There is a text box for the plan’s “Date Approved”.

Justification: DOI is requesting that the non-Federal repository housing DOI collections confirm if it possesses an Emergency Management Plan (which is mandatory for DOI units) or its equivalent, in accordance with DOI policy and accepted U.S. museum standards.

3. “A Security Plan establishes the museum security program. The Security Plan must include procedures for: 1) authorizing access, including key control and opening and closing requirements; 2) recording/tracking

object movement; 3) using a combination of staff, mechanical devices, and/or electronic systems that are adequate to the risks; 4) securing exhibits at all times; and 5) staff training. The Security Plan has been reviewed, and updated if necessary, in the last five years.”

There is a text box for the plan’s “Date Approved”.

Justification: DOI is requesting that the non-Federal repository housing DOI collections confirm if it possesses a Security Plan (which is mandatory for DOI units) or its equivalent, in accordance with DOI policy and accepted U.S. museum standards.

4. “An Integrated Pest Management (IPM) Plan specifies the procedures to prevent and resolve pest problems in the most efficient and ecologically sound manner without compromising the safety of the collections, visitors, and staff. The IPM Plan must be implemented for all spaces housing museum collections and include procedures for: 1) monitoring and inspecting the objects and spaces; 2) identifying and documenting the presence of pests; 3) discouraging/mitigating pests by habitat modification and good housekeeping; 4) response/treatment; and 5) training. The IPM Plan has been reviewed, and updated if necessary, in the last five years.”

There is a text box for the plan’s “Date Approved”.

Justification: DOI is requesting that the non-Federal repository housing DOI collections confirm if it possesses an IPM Plan (which is mandatory for DOI units) or its equivalent, in accordance with DOI policy and accepted U.S. museum standards.

5. “A Housekeeping Plan provides clear direction for minimizing agents of deterioration and maintaining clean spaces and objects. The Housekeeping Plan must include: 1) procedures and schedules for performing housekeeping tasks; 2) proper handling and cleaning methods and techniques; 3) identifying and training responsible staff; 4) supplies and equipment to be used; and 5) restrictions on smoking, drinking, and eating in collection storage spaces and rules for these activities in other spaces. The Housekeeping Plan has been reviewed, and updated if necessary, in the last five years.”

There is a text box for the plan’s “Date Approved”.

Justification: DOI is requesting that the non-Federal repository housing DOI collections confirm if it possesses a Housekeeping Plan (which is

mandatory for DOI units) or its equivalent, in accordance with DOI policy and accepted U.S. museum standards.

6. “List any other museum planning and management documents the facility has:”

Justification: DOI is requesting this information from its non-Federal repositories that house DOI collections to determine if any other documents pertaining to the facility are relevant to the DOI collections housed there. This information allows for enhanced planning, management, preservation, stewardship, and use of the DOI collections.

Evaluation Elements for Exhibit and Storage Spaces

1. “A qualified museum professional has assessed the space, and has determined the appropriate environmental controls for the objects.”

Justification: All spaces housing DOI museum collections must be evaluated by a trained museum conservator, curator, or other individual with preventive conservation expertise. The evaluation will determine the space’s suitability to house museum collections, as well as gather information pertaining to any needed systems, equipment, or controls to ensure a proper museum environment.

2. “The environment in the space is controlled to protect the predominant collections.”

Justification: This information is required to document that the non-Federal repository has ensured that the space housing DOI collections maintains an appropriate museum environment, as necessary to ensure the preservation of the predominant types of collections stored therein.

For example, textiles and biological specimens are much more sensitive to temperature and humidity fluctuations compared to archaeological objects composed of stone and geological specimens. If textiles and biological specimens constitute the bulk of the collection, then the space must be appropriate to those object types’ more stringent preservation requirements.

3. “Appropriate microclimates are used in the space to protect environmentally sensitive objects.” (If there are no environmentally sensitive objects in the space, the evaluator should note this element as not applicable.)

Justification: This information is required to document that environmentally sensitive DOI museum objects at the non-Federal repository are housed in appropriate microclimates (e.g., sealed exhibit cases, storage cabinets, or other containers) if the environment of the larger space (e.g., exhibit gallery, room, or storage area) is unable to meet such objects' preservation needs.

4. "Temperature and relative humidity: are monitored in the space on an appropriate schedule and deficiencies are addressed."

Justification: This information is required to document that the non-Federal repository has implemented a program of monitoring temperature and relative humidity (RH). Consistent, regularly scheduled monitoring of temperature and RH ensures that staff are always aware of the space's environmental conditions, are promptly alerted of any changes that might harm the collections, and can respond accordingly to correct the problem.

5. "Visible and ultraviolet light levels: are monitored in the space on an appropriate schedule and deficiencies are addressed."

Justification: This information is required to document that the non-Federal repository has implemented a program of monitoring visible and ultraviolet (UV) light levels. Consistent, regularly scheduled light monitoring of all museum areas ensures that staff are always aware of each space's suitability for museum collections, especially for objects that are particularly light-sensitive. A regular monitoring program ensures that staff are promptly alerted of any changes that might harm the collections and can respond accordingly to correct the problem. Examples may include deteriorating window shades, blinds, awnings, or UV-filtering film; unannounced changes in lighting systems, schedules, and procedures; or other similar circumstances.

6. "If there are windows in the space, the museum objects are appropriately protected from agents of deterioration." (If windows are not present in the space, the evaluator should note this element as not applicable.)

Justification: This information is required to document that the non-Federal repository has secured exterior windows and employs shutters, blinds, curtains, filters, enclosed storage cabinets, or a combination thereof, to protect museum objects from the various agents of deterioration, in accordance with DOI policy and accepted U.S. museum standards.

7. "Heating, ventilation, air conditioning (HVAC), and humidity control

systems and filters are cleaned and maintained on an appropriate schedule and replaced when needed.” (If there are no environmental control systems in the space, the evaluator should note this element as not applicable.)

Justification: This information is required to document that the non-Federal repository has an appropriate HVAC system to ensure that environmental conditions within the building are suitable for museum collections, in accordance with DOI policy and accepted U.S. museum standards. To be effective and perform as designed, HVAC systems and components (including filters) must be routinely inspected, cleaned, maintained, and replaced on an appropriate schedule developed by the manufacturer.

8. “Using integrated pest management principles, pests are: monitored, identified, and controlled.”

Justification: This information is required to document that the non-Federal repository has established an ongoing integrated pest management (IPM) program to protect the collections from damage due to insects, rodents, or other pests. In accordance with DOI policy and accepted U.S. museum standards, the institution’s IPM program should include monitoring, identifying, and controlling museum pests.

9. “Environmental data are: analyzed and documented and retained.”

Justification: This information is required to document that the non-Federal repository has an ongoing environmental monitoring program that includes recording, analysis, and retention of data, in accordance with DOI policy and accepted U.S. museum standards.

10. “Appropriate measures are taken to mitigate potential risks from local threats.”

Justification: This information is required to document that the non-Federal repository has identified and developed countermeasures to the various natural and human-caused threats to the facility and the collections within, in accordance with DOI policy and accepted U.S. museum standards.

11. “Appropriate measures are taken to mitigate risks of water damage to museum objects from broken pipes, backed-up drains, or potential points of water entry.”

Justification: This information is required to document that the non-

Federal repository has identified and alleviated water-related risks that might damage collections in the facility, in accordance with DOI policy and accepted U.S. museum standards. Water damage is the most common threat to museum collections.

12. "Egress/exit routes are: clearly marked and unobstructed."

Justification: This information is required to document that the non-Federal repository is in compliance with the fire code, the regulations of the Occupational Safety & Health Administration (OSHA), the National Institute for Occupational Safety and Health (NIOSH), and all other Federal, state, and local laws and regulations concerning life safety, in accordance with DOI policy and accepted U.S. museum standards.

13. "Staff are regularly trained in risk mitigation and emergency response procedures for museum collections."

Justification: This information is required to document that the non-Federal repository is in compliance with all applicable employee training requirements and regulations of OSHA, NIOSH, relevant state/local agencies, and all other Federal, state, and local laws and regulations concerning employee life safety and emergency response. A properly trained workforce ensures enhanced safety for the repository's staff, visitors, facilities, and collections.

14. "Physical security measures are: identified by an appropriate specialist and sufficient to mitigate the risks to the objects."

Justification: This information is required to document that the non-Federal repository has worked with a physical security specialist to identify threats to the facility, collections, visitors, and staff and developed appropriate mitigation measures, in accordance with DOI policy and accepted U.S. museum standards.

15. "Security procedures are performed consistently including: key control, access control, and opening and closing."

Justification: This information is required to document that the non-Federal repository has developed and implemented appropriate standard operating procedures (SOPs) for museum security. The security SOPs are consistently carried out by all staff to provide protection against identified threats to the facility, collections, visitors and staff, in accordance with DOI policy and accepted U.S. museum standards.

16. “Staff are regularly trained in security procedures.”

Justification: This information is required to document that the non-Federal repository has implemented a security training program for its staff and conducts regularly scheduled training sessions to ensure that all employees know and consistently carry out the institution’s policies and procedures for protecting visitors, staff, the collections, and the facility from crime, in accordance with Federal and state laws and regulations, DOI policy, and accepted U.S. museum standards.

17. “Electronic intrusion detection systems are: inspected and tested by qualified personnel on an appropriate schedule and maintained by qualified personnel on an appropriate schedule.” (If there are no electronic intrusion detection systems in the space, the evaluator should note this element as not applicable.)

Justification: This information is required to document that the non-Federal repository has implemented an inspection, testing, and maintenance (ITM) program for its electronic intrusion detection systems in compliance with all Federal, state, and local codes, industry standards, and the manufacturer’s recommendations. All such ITM procedures must be performed by properly trained personnel on a schedule that conforms to all Federal, state, and local codes, industry standards, and the manufacturer’s recommendations. DOI policy and accepted U.S. museum standards require proper ITM of all security systems at an institution.

18. “Fire detection and suppression equipment and systems are unobstructed and fire extinguishers are accessible.”

Justification: This information is required to document that the DOI museum collections and the non-Federal repository that houses those collections are properly protected from the threat of fire and that the non-Federal repository is in compliance with: the local fire code; the codes and standards of the National Fire Protection Association (NFPA); the regulations of OSHA and NIOSH; and all other Federal, state, and local laws and regulations concerning fire safety, in accordance with DOI policy and accepted U.S. museum standards.

19. “Fire detection and suppression equipment and systems are: inspected and tested by qualified personnel on an appropriate schedule and maintained by qualified personnel on an appropriate schedule.”

Justification: This information is required to document that the non-Federal repository has implemented an ITM program for its fire detection

and suppression equipment and systems in compliance with all NFPA codes and standards; Federal, state, and local mandates and codes; industry standards; and the manufacturer's recommendations. The fire code requires that all such ITM procedures be performed by properly trained personnel on a schedule that conforms to all NFPA codes and standards; Federal, state, and local codes and regulations; industry standards; and the manufacturer's recommendations. DOI policy and accepted U.S. museum standards require proper ITM of all fire detection and suppression equipment and systems at an institution.

20. "All staff are properly trained in fire safety procedures."

Justification: This information is required to document that the non-Federal repository has developed an appropriate fire safety training program for its staff. The program must include regularly scheduled training sessions to ensure that all employees know, and consistently carry out, the institution's policies and procedures for protecting visitors, staff, the collections, and the facility from fire. The development, implementation, and execution of such training programs is required for compliance with relevant NFPA codes and standards; OSHA and NIOSH regulations; Federal, state, and local codes, laws, and regulations; DOI policy; and accepted U.S. museum standards.

21. "The space is clean and uncluttered, and housekeeping is performed on a written schedule."

Justification: This information is required to document that the non-Federal repository has instituted a museum Housekeeping Plan, in accordance with DOI policy and accepted U.S. museum standards. A Housekeeping Plan ensures that housekeeping routines are sensitive to museum collections preservation needs, and includes procedures, techniques, schedules, and a listing of approved supplies and equipment to be used for housekeeping in every space that houses museum collections.

22. "Rules against eating, drinking, smoking, and use of live plant materials in the space are enforced."

Justification: This information is required to document that the non-Federal repository has instituted policies prohibiting eating, drinking, smoking, and use of live plant materials in all spaces housing museum collections. DOI policy prohibits eating, drinking, smoking, and the use of live plant materials in all museum spaces. These activities seriously endanger museum collections to damage or destruction resulting from insects, rodents, and other pests attracted to food and plants, stains and spills, and smoke, soot, and fire.

23. “Staff are trained to properly handle museum objects and perform housekeeping.”

Justification: This information is required to document that all curatorial staff at the non-Federal repository have received appropriate museum housekeeping training. Such training must include the proper handling of collections and all of the various tasks included in the institution’s Housekeeping Plan, in accordance with DOI policy and accepted U.S. museum standards.

24. “Museum-quality mounts, cases, containers, cabinets, racks, and/or shelves are sufficient and appropriate to safely house the objects without crowding, overloading, or movement.”

Justification: This information is required to document that object mounts, support systems, and housings in use at the non-Federal repository are appropriate for museum use. In accordance with DOI policy and accepted U.S. museum standards, such supports and housings must be durable and composed of inert, museum-quality materials. They should maintain the objects in a safe, stable, secure, and stationary manner. This will protect the objects from breakage or damage due to motion, falls, and collisions with people or other objects. The use of inert museum-quality materials prevents off-gassing of harmful chemicals or other compounds commonly found in many industrial and consumer products.

25. “Museum collection management systems’: data are backed up on an appropriate schedule and backup files are kept offsite in appropriate storage.” (If only paper records are used, the evaluator should note this element not applicable.)

Justification: This information is required to document that the non-Federal repository has implemented appropriate museum data security protocols in accordance with DOI policy, accepted U.S. museum standards, and recognized IT industry standards. The protocols should state that all museum data are regularly backed up and stored at a secure offsite location. All software, equipment, and systems used for backup purposes should be industry standard, commercially-available, resilient, secure, and easy to access for data restoration purposes by authorized personnel following a crime, system malfunction, fire, or other disaster that damaged or destroyed data on the primary storage medium.

26. “All museum records are stored appropriately to ensure their

preservation against fire, theft, and loss of physical or digital integrity.”

Justification: This information is required to document that museum records at the non-Federal repository are securely housed and protected from all threats, especially fire, theft, and other damage. DOI policy and accepted U.S. museum standards place great emphasis on the protection of museum records. Loss of the information contained therein can be catastrophic and render a collection meaningless.

Evaluation Element for Exhibit Spaces Only

27. “Museum objects are exhibited for a length of time that is appropriate for the preservation of the objects.”

Justification: This information is required to document that the non-Federal repository has implemented preventive conservation program that includes rotation of objects from exhibit to storage at appropriate intervals.

Long term exhibition of museum objects, especially those composed of organic materials, such as paper or natural history specimens, can be damaging and accelerate overall deterioration. Objects on exhibit are subject to greater stress (e.g., light, handling, and greater potential for damaging temperature and RH fluctuations) than those in an enclosed, protective storage environment. In order to balance the competing interests of preservation and exhibition of an object, DOI policy and accepted U.S. museum standards prescribe the implementation of preventive conservation programs. Such programs must include the rotation of objects from exhibit to storage environments at intervals determined by an object’s physical characteristics, strengths, and inherent weaknesses.

Evaluation Elements for Storage Spaces Only

28. “The space is dedicated to housing museum collections.”

Justification: This information is required to document that the museum storage spaces at the non-Federal repository are only used for storage of objects. According to DOI policy and accepted U.S. museum standards, museum storage spaces should only be used for storage of museum objects. Storage spaces should not be used as offices, labs, or work areas. Likewise, museum objects should never be stored in offices, labs, or other workspaces, other than for short periods when an object is being cataloged, analyzed, or otherwise used for research purposes.

Storage of museum objects within a dedicated collections storage area provides greater security for the objects from theft, damage due to accidents, spills, pests, environmental fluctuations, and many other potential threats.

29. “The space is organized to ensure safe movement of staff, equipment, and museum objects, and to facilitate access to objects.”

Justification: This information is required to document that the museum storage spaces at the non-Federal repository are safe for both people and collections. DOI policy and accepted U.S. museum standards require adherence to all Federal, state, and local requirements pertaining to life safety, accessibility, egress, and movement. Doors, access aisles, and other passageways must be wide enough for to safely accommodate people and collections. Aisles, halls, and passages must be clear of museum objects, boxes, equipment, and tripping hazards. Over-sized objects with protruding parts that constitute a hazard must be flagged and/or roped off.

30. “The size of the space is sufficient to: house current museum collections and accommodate planned growth.”

Justification: This information is required to document that the non-Federal repository currently possesses adequate space to properly house its existing collections. For example, the space is large enough for the required number of cabinets, shelves, boxes, or other storage furniture. Furthermore, the repository has space for the proper storage of collections resulting from anticipated growth over the next twenty-five years. If extra storage space at the facility is unavailable, additional DOI collections should be housed at another facility that also is assessed by use of the Checklist.

31. “Procedures are in place to escort and monitor non-curatorial staff who service utility meters and other equipment located in the space.” (If there are no utility meters or other equipment in the space, the evaluator should note this element as not applicable.)

Justification: DOI policy and accepted U.S. museum standards call for utility meters, systems, and equipment (e.g., air handling units, furnaces, hot water heaters, and fire pumps) to be located away from museum storage spaces. However, electrical panel boxes are sometimes located in storage areas and additional utility equipment may be located in the space if it formerly served another purpose (and the cost of relocating the equipment was prohibitive). In these instances, the repository’s security and access protocols should include a policy that all non-

curatorial staff needing service access must be escorted and monitored at all times by a museum staff member. This policy must be consistently adhered to at all times, as noncompliance places the collection at jeopardy due to theft, fire, breakage, or other damage.

32. "Museum objects are protected from dust, pests, and particulates through the use of air filters, dust covers, bags, boxes, and/or cabinets."

Dust, pests, particulates, and pollution are all agents of deterioration that seriously damage museum collections. Effective countermeasures that museums employ include: air filters, such as high-efficiency particulate air (HEPA) filters; air purifiers; the use of cotton or polyethylene dust covers on furniture and over-sized objects; polyethylene bags; archival storage boxes; and enclosed, locking, metal storage cabinets with a gasket sealing mechanism.

Justification: This information is required to document that the non-Federal repository uses any or all of the above techniques to protect collections in its care from pests, dust, and other types of airborne agents of deterioration.

33. "Hazardous materials are: identified using labels and signage that conform to applicable Federal or local requirements and stored in an approved cabinet outside of the storage space."

Justification: DOI policy, accepted U.S. museum standards, the fire code, and Federal, state, and local laws and regulations require that: hazardous materials (HAZMAT) are properly identified using approved labels and signage and must be stored in an approved cabinet outside of the storage space. This information is required to document that the non-Federal repository complies with relevant laws, regulations, and standards pertaining to identification and proper storage of HAZMAT.

34. "Any museum objects that may pose health risks are: identified using labels and signage that conform to applicable Federal or local requirements and appropriately packaged." (If no objects posing health risks are present, the evaluator should note this element as not applicable.)

Justification: DOI policy, accepted U.S. museum standards, and Federal, state, and local occupational safety laws and regulations require that all materials that may pose a threat to human health must be properly identified, labelled, and packaged. All such labels, signage, and packaging should conform to applicable Federal, state, or local requirements. This information is required to document that the non-

Federal repository complies with relevant laws, regulations, and standards pertaining to identification, labelling, and proper storage of such dangerous materials.

35. “Fluid-preserved specimens are housed in a space that is separate from dry specimen collections.” (If there are no fluid-preserved specimens in the space, the evaluator should note this element as not applicable.)

Justification: This information is required to document that the non-Federal repository houses all fluid-preserved specimens in a location separate from its dry specimens and adheres to the fire code and all applicable Federal, state, and local requirements. The fluids used to prepare and preserve natural history specimens are flammable, hazardous to human health, or both. Ethanol and isopropanol are flammable, formalin is a carcinogen, and other chemicals used in preparation are toxic.

Once prepared, the primary risk from fluid-preserved specimens is fire, as alcohol (70-90% ethanol and 50-60% isopropanol) is a common storage fluid for specimens. Small fluid-preserved collections should be housed inside a fire-resistant flammable storage cabinet that complies with the fire code, NFPA standards, and OSHA regulations. Larger collections should be stored in a dedicated room with separate air-handling systems, fire detection and suppression systems, explosion-proof lighting and electrical systems, and floor drains and gutters to collect and contain chemical spills.

D. Inventory of Museum Collections: The museum inventory is an itemized listing of museum objects; and/or the act of physically locating all or a random sample of the museum objects for which a DOI unit is responsible and verifying information in the related catalog or accession records. DOI units that manage museum property must conduct each of the following three types of inventory on an annual or biennial basis, as noted:

- 1) **Inventory of Cataloged Museum Objects:** An inventory of all cataloged objects (this inventory may be a statistical random sample of the complete collection) must be carried out every two years, at a minimum. A statistical random sample inventory, from one to 203 objects, constitutes an inventory of all cataloged objects. See DOI Museum Property Directive 21, *Inventory of Museum Collections, Appendix I, Random Sampling Table*.
- 2) **Controlled Property Inventory:** All museum objects that are controlled property (all firearms and especially significant and/or valuable objects) must be inventoried annually.

- 3) Accessions Inventory: Accessioned objects that have not yet been cataloged must be inventoried every two years, at a minimum. The accessions inventory may be a statistical random sample.

DOI museum management staff usually complete the museum inventory. However, staff at non-Federal repositories housing DOI collections may be asked to:

- Confirm the current locations, item counts, and conditions of objects on an inventory list generated by a DOI unit. This is the most common method used by DOI units to verify objects listed on the inventory that are housed at a non-Federal repository. Such verification is usually documented by email correspondence, which provides a written record and is less burdensome for DOI's non-Federal repositories.
- Carry out the inventory of DOI collections at their facility, in keeping with the responsibilities specified in a repository agreement, Memorandum of Agreement, Memorandum of Understanding, cooperative agreement, contract, or other document following the procedures detailed in DOI Museum Property Directive 21, *Inventory of Museum Collections*.
- Assist a DOI staff member in carrying out the inventory at the non-Federal repository using the method provided by the DOI staff member.

Justification: 411 DM; DOI Museum Property Directive 3, *Required Standards for Documenting Museum Property*; DOI Museum Property Directive 21, *Inventory of Museum Collections*; and Interior Property Management Directive 114-60.3 mandate that the following information must be completed and verified during an inventory:

- Object(s) found: An object's presence must be verified by comparing the catalog number on the catalog record (or accession number when inventorying accessioned but not cataloged objects) with the number on the object or its associated tag or label. If the object is missing, the procedures in Paragraph 1.12A of Directive 21 must be followed.
- Item count: The number of objects indicated in the accession or catalog record must be verified by comparing it with the physical count.
- Location: The location of the object as recorded in the catalog or accession record must be verified by comparing it with the actual physical location.
- Condition: The physical state of the object must be examined to determine if the condition of the object has changed when compared to

the information in the catalog or accession record.

- Date of Inventory: The date that the object was inventoried must be recorded.
- Inventory Method: The inventory method selected for each object must be recorded.

The accession or catalog record must be updated, as needed.

E. Input on Collections from Lands Administered by the U.S. Department of the Interior that are Located at Non-Federal Facilities (Input Form):

Numerous DOI collections, primarily archaeological, ethnographic, and natural history specimens, have been collected by university- and museum-based scientists and researchers from public lands administered by DOI. Today, these activities are documented and controlled by permit at the individual DOI unit level. During much of the 20th century, many DOI collections, along with their associated documentation, were sent to various universities and museums for research, storage, and exhibit purposes. In many instances, the supporting chain-of-custody documentation is missing, inadequate, or was never prepared. As a consequence, DOI has been unable to locate many of these legacy collections, although DOI is accountable for their preservation, documentation, management, and accessibility as part of its public stewardship responsibilities mandated by Federal laws, regulations, and policies.

This issue was noted in the FY 2010 OIG report. Recommendation #9 in the report stated that DOI should “Increase effectiveness of control over museum collections held at non-DOI facilities by: identifying all organizations that hold DOI collections; identifying all objects held by those organizations; and, ensuring that annual physical inventories are conducted.”

The bureaus have been diligently working to address this issue; however, the most effective approach at obtaining this information and ensuring that inventories are collected is through a DOI-wide effort. In response, DOI developed the Input Form. This form was created to facilitate the exchange of important new information about DOI collections.

The bureaus have identified a number of non-Federal repositories that are thought to hold DOI collections. However, lack of staff and funding, along with travel restrictions, have prevented additional research (including site visits to the respective repositories) or confirmation. In response, DOI developed the Input Form as a means for the bureaus to obtain this needed information. Following an initial communication introducing the project and its goals and confirming proper repository contact information, a link to the form is sent to each non-Federal repository thought to hold DOI collections. As with most

online surveys, staff at those non-Federal repositories complete the survey when it is most convenient for them. The system allows users to stop and start up again at the same spot however often may be needed.

Through a targeted, strategic approach, DOI gains vital information that it currently lacks concerning objects, scientific specimens, and associated records generated from projects or other activities on the public lands managed by DOI from 1906 to present. Any information that the non-Federal repositories furnish supports DOI's ability to work in partnership with them to provide enhanced preservation and protection of, and public education and scientific research opportunities for the use of, these important collections.

The Input Form includes the following questions (a justification for the inclusion of each question in the ICR is included as well):

- "Institution" name and "Address"

Justification: This information is required to document the name and location of the non-Federal repository that may house DOI collections for proper accountability, as required by 411 DM.

- "Completed by", including:
 - o "Title", "Email", and "Telephone (xxx-xxx-xxxx)".
 - o "Official Contact (if different)", "Title", "Email", and "Telephone (xxx-xxx-xxxx)".

Justification: This information is required to document the name and contact information of the responsible official at the non-Federal repository that may house DOI collections for proper accountability, as required by 411 DM. It also facilitates future correspondence with the non-Federal repository.

- "Does your institution hold any artifacts, scientific specimens, other objects, or associated records generated from projects or activities on DOI-administered lands?"

If the respondent answers "No", a thank you message is displayed and no other responses are needed.

If the respondent answers "Yes" or "Maybe", a new screen is displayed that states:

"You answered "yes" or "maybe" to the previous question of whether your institution holds any artifacts, scientific specimens, other objects, or associated records generated from projects or activities on DOI-

administered lands. If this is incorrect, you may go back and revise your answer. Please note which DOI bureaus (either known or suspected). Please select "Yes," "No," or "Maybe" for all lines."

The following bureaus are listed: "Bureau of Indian Affairs"; "Bureau of Land Management"; "Bureau of Reclamation"; "Fish and Wildlife Service"; "National Park Service"; and the "U.S. Geological Survey".

There is also a check box for "This institution likely has items from DOI-administered lands, but we lack the expertise or resources to assess them."

Justification: This information is requested to ascertain if the respondent's institution houses DOI museum collections. If the institution does not house any DOI collections, no additional information is needed and the respondent can then submit the form. This question ensures that the burden is virtually nonexistent for respondents whose institutions do not house any DOI collections. If the answer is "Yes", this information allows the DOI bureau that is accountable for the collections to contact the non-Federal repository for additional data.

- "What is the basis of this determination?"

Check boxes for possible answers include: "Current Curation Agreement"; "Long-term Loan Agreement"; "Project Permit Information"; "Contract for Curation"; "Memorandum of Understanding"; "Institutional History"; "Database or Catalog Records"; "I don't know"; and "Other" with space to enter an answer.

Justification: This question was developed to document the process that the institution used to determine that it does curate DOI collections. DOI policy requires units that house collections in a non-Federal repository to establish a formal agreement with the non-Federal repository. The agreement must establish the respective responsibilities for preservation, protection, storage, care, and use of the bureaus' museum collections housed at the non-Federal repository.

If a formal agreement does not exist, information to that effect enables the DOI unit to prioritize, establish, and implement any needed agreements. Any such agreements will specify mutually agreeable responsibilities, priorities, work plans, funding requirements, and other relevant issues in the interests of all parties.

- “What disciplines does your repository curate?”

Check boxes for possible answers include: “Archaeology”; “Archives”; “Art”; “Biology”; “Ethnography”; “Geology”; “History”; “Paleontology”; and “Other” with space to enter an answer.

Justification: This information is requested to document what types of DOI collections are housed at the non-Federal repository, allowing for greatly enhanced accountability for the collections. In addition, these data assist DOI in the development of consolidation feasibility studies, strategic planning documents, funding requests, research proposals, work plans, exhibit plans, and other initiatives to ensure that the DOI collections are preserved, protected, and made available for use in the most practical, fiscally-responsible manner. This information should benefit both DOI and the non-Federal repositories housing DOI collections.

- “You answered that you know/suspect there are collections associated with the [bureau identified previously] at your institution. If possible, please estimate the number (or cubic/linear feet) of objects and associated records from [bureau identified previously]-administered lands, by discipline. If you do not know, please tell us what you do know in the comments box.”

There is a table with cells to note “Number of Objects”, “Cubic Feet of Objects”, “Lots of Objects”, and “Linear Feet of Associated Records” for each discipline (“Archaeology”, “Archives”, “Art”, “Biology”, “Ethnography”, “Geology”, “History”, and “Paleontology”). There is a “Comments” box beneath the table to provide room for the respondent to provide clarifications. Once these data are entered and the respondent chooses the “Next” button, an identical screen for the next bureau that was identified previously is displayed. If no other bureaus were identified, the next question is displayed.

Justification: This information is requested to document how many DOI objects, by discipline and DOI bureau, are housed at the non-Federal repository. These data are vital to providing enhanced accountability for the collections. DOI must know where its collections are located and how many objects, by discipline types, are housed at each location.

This information should benefit both DOI and the non-Federal repository. It facilitates their ability to work cooperatively to:

- Address preservation deficiencies.

- Provide enhanced information concerning the collections to the public.
 - Develop funding requests for: storage upgrades and conservation treatments; publications and exhibits; and storage plans, preservation plans, and other planning documents.
 - Develop, prioritize, fund, and implement needed research projects using these DOI collections.
- “Are part or all of the collections from DOI-administered lands accessioned?”

The respondent can choose “Yes”, “No”, or “I don’t know”.

“If part or all of the collections from DOI-administered lands are accessioned, what is the estimated percentage?”

There is a cell to note the estimated percentage.

“If yes, are they accessioned by your institution or by a DOI bureau/office?”

The respondent can choose “DOI”, “My Institution”, “DOI & My Institution”, or “I don’t know”. There is a “Comments” box beneath.

Justification: This information is requested to document if the DOI collections have been accessioned (partially or completely). 411 DM requires that all DOI collections be accessioned. If the collections have not yet been accessioned, such information is extremely useful to the DOI unit as it establishes and prioritizes its annual work plan, schedules, and budget requests. See Question 2., Section B. “Accession Records,” above, for additional information.

- “Are part or all of the collections from DOI-administered lands cataloged?”

The respondent can choose “Yes”, “No”, or “I don’t know”.

Justification: This information is requested to document if the DOI collections have been cataloged (partially or completely). 411 DM requires that all DOI collections be cataloged. If the collections have not yet been cataloged, such information is extremely useful to the DOI unit as it establishes and prioritizes its annual work plan, schedules,

and budget requests. See Question 2., Section A. “Catalog Records,” above, for additional information.

- “You answered “yes” to the previous question. Please select the bureaus for which your repository has cataloged collections.”

The following bureaus are listed with check boxes: “Bureau of Indian Affairs”; “Bureau of Land Management”; “Bureau of Reclamation”; “Fish and Wildlife Service”; “National Park Service”; “U.S. Geological Survey”; and “I don’t know”.

This screen is displayed if the respondent answered “Yes” to the previous question. If the respondent answered “No” or “I don’t know”, a screen pertaining to NAGPRA (see third bullet, below) is displayed.

Justification: This information is requested to provide DOI with additional specific data pertaining to the level of documentation already carried out for the DOI collections at the non-Federal repository. Such information is extremely useful to DOI in the development of scopes of work, work plans, schedules, budget requests, and other mechanisms to ensure that documentation required by 411 DM is accomplished.

- “You answered that all or some of your collections associated with the [bureau identified previously] at your institution have been cataloged. If possible, please estimate the following for the [bureau identified previously]: number of catalog records created; percent of cataloged objects, by discipline; and percentage of paper versus digital catalog records. If you do not know, please tell us what you do know in the comments box.”

There is a table with cells to note “Number of Catalog Records”, “% Cataloged”, “% Paper Only”, and “% Digital” for each discipline (“Archaeology”, “Archives”, “Art”, “Biology”, “Ethnography”, “Geology”, “History”, and “Paleontology”). There is a “Comments” box beneath the table. Once these data are entered and the respondent chooses the “Next” button, an identical screen for the next bureau that was identified previously is displayed. If no other bureaus were identified, the next question is displayed.

- “Are any of the collections from DOI-administered lands cataloged in an electronic database system?”

The respondent can choose “Yes”, “No”, or “I don’t know”. If “Yes” is selected, the respondent is asked: “If yes, what database system is used? (Check all that apply.)” The respondent can then choose from

among the following database systems: “Argus”, “CONTENTdm”, “KE Emu”, “Microsoft Access”, “Microsoft Excel”, “Mimsy”, “MINISIS”, “Mint”, “Museum Plus”, “Past Perfect”, “Re:discovery/Proficio”, “Specify”, “TMS/Gallery Systems”, “Vernon CMS”, and “Other” (with text box to note name of program).

Justification: This information is requested to allow DOI to develop the most efficient, cost-effective measures to import these data into ICMS/MCMS without placing a burden upon the non-Federal repositories. ICMS/MCMS is the mandatory DOI-wide information management system used to provide consistency in accounting for, documenting, reporting on, and providing physical and intellectual access to museum property. In addition to catalog and accession data, ICMS/MCMS is used for museum inventories, loans, and facility assessments using the Checklist.

- “To the best of your knowledge, are any of the collections from DOI-administered lands subject to the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)?”

The respondent can choose “Yes”, “No”, or “I don’t know”.

Justification: This information is requested to identify the presence of any DOI collections at the non-Federal repository that may be subject to NAGPRA. NAGPRA provides a process for museums and Federal agencies to return certain Native American cultural items—human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants, and culturally affiliated Indian tribes and Native Hawaiian organizations.

In July 2010, the U.S. Government Accountability Office (GAO) issued a report: GAO-10-768, *Native American Graves Protection and Repatriation Act: After Almost 20 Years, Key Federal Agencies Still Have Not Fully Complied with the Act*. In the report, GAO found that:

- a. “Key Federal agencies still have not fully complied with the act for their historical collections acquired on or before NAGPRA’s enactment.”
- b. “Some of the...agencies have not fully complied with NAGPRA’s requirement to publish notices of inventory completion for all of their culturally affiliated human remains and associated funerary objects in the *Federal Register*.”

- c. “Until agencies (1) identify all of the possible NAGPRA items in their historical collections, (2) establish cultural affiliations to the extent possible, and (3) publish the required notices, they cannot repatriate their Native American human remains and objects.”

This information supports DOI compliance with NAGPRA and addresses the GAO’s findings through the following:

- o DOI’s “historical collections” as noted above include unidentified legacy collections that are currently housed in non-Federal repositories, which may include NAGPRA items.
 - o Some of the unidentified DOI legacy collections may include NAGPRA items. This information facilitates a more expeditious identification of any currently unknown NAGPRA items.
 - o Once any NAGPRA items are identified, DOI can then work with the non-Federal repository to:
 1. Establish cultural affiliations.
 2. Publish the required notices in the *Federal Register*.
 3. Repatriate their Native American human remains and objects.
- “Has a physical inventory of collections from DOI-administered lands been completed?”

The respondent can choose “Yes”, “No”, or “I don’t know”.

Justification: 411 DM; DOI Museum Property Directive 3, *Required Standards for Documenting Museum Property*; DOI Museum Property Directive 21, *Inventory of Museum Collections*; and Interior Property Management Directive 114-60.3 mandate that all DOI museum collections, whether housed in bureau or non-Federal facilities, must be inventoried on a regular basis. Such inventories verify the physical location and condition of objects and the accuracy of the catalog record; reveal potential loss or theft; assist in decision making about collections use, growth, storage, and security; and maintain accountability.

Given the Departmental requirements for inventory, it is important to know if inventory is being conducted at the non-Federal repositories.

This assists in programming for this activity in future years.

The need to ensure that inventories of DOI museum collections housed in non-Federal facilities are carried out also was recognized in the FY 2010 OIG report. Recommendation #9 in the report stated that DOI should “Increase effectiveness of control over museum collections *held at non-DOI facilities* by: identifying all organizations that hold DOI collections; identifying all objects held by those organizations; and, *ensuring that annual physical inventories are conducted.*” [Emphasis added.]

- “You indicated above that a physical inventory of collections from DOI-administered lands has been completed. Please note the type of inventory:”

The respondent can choose “Full”, “Partial”, “Random Sample”, or “I don't know”.

“Please provide the date of the most recent inventory.”

There is a text field to note the date of the most recent inventory.

Justification: 411 DM; DOI Museum Property Directive 3, *Required Standards for Documenting Museum Property*; DOI Museum Property Directive 21, *Inventory of Museum Collections*; and Interior Property Management Directive 114-60.3 mandate that all DOI museum collections, whether housed in bureau or non-Federal facilities, must be inventoried on a regular basis. This information provides important information to DOI concerning the frequency of required inventories and the methods used.

- “Are collections from DOI-administered lands: Used for research? Used in exhibits (including online)? Loaned out to other institutions?”

There is a table with check boxes for respondent to choose from the following options: “Frequently”, “Sometimes”; or “Never”.

Justification: This information is requested to document how DOI collections housed in non-Federal facilities are used. 411 DM 1.4 states that DOI “...acquires and manages museum property to support its mission; comply with laws and other mandates; promote research, preservation, public education, and science-based decision-making about resource management; and serve as a steward of these cultural and natural resources for present and future generations.”

In order to fulfill its public stewardship role, it is critical for DOI to understand how its collections at non-Federal repositories are used. DOI's mandate of preservation and access requires a careful balance of providing access for exhibits, research, and education on one side and long-term preservation on the other. Both qualitative and quantitative data in this regard enables DOI, working with its non-Federal partners, to facilitate access, ensure long-term preservation, and develop strategies for improvements, if needed.

- “Do you continue to accept collections from DOI?”

The respondent can choose “Yes”, “No”, or “I don't know”.

If the respondent chooses “Yes”, a new screen is displayed with the next question (see next bullet, below). If “No” or “I don't know” is selected, the following screen is displayed: “You answered “no” to the previous question. Why not? (Choose all that apply)”. Check boxes include: “Lack of space”; “Not a collection focus”; “Lack of research interest”; “Have not received requests from DOI agencies”; “Prefer not to accept them”; “Cannot meet DOI standards”; “I don't know”; and “Other” (with text field to provide details).

Justification: This question is included to determine if the non-Federal repository is still interested in assisting with the curation of DOI collections. If not, the check boxes provide DOI with a better understanding of the factors that impact the decisions about collections storage at the non-Federal repository being contacted. This information is critical for establishing DOI's long-term strategies for storage and preservation of its collections.

- “Did your responses to this survey include information your institution is already reporting to a DOI Bureau/Office? Please explain if your answer is “Yes” or “I don't know”.

The respondent can check “Yes”, “No”, or “I don't know”. There is a “Comments” box beneath the available answers.

- “How many other departments at your institution may have collections from DOI lands? (If none or unknown, enter 0.)”

A field is provided for the respondent to note the number. If the respondent notes zero, a new screen is displayed with the next question (see next bullet, below). If the respondent chooses one or more, the respondent is asked to provide the department(s) name, contact(s), and email for contact(s): “Please note the following for the

first department at your institution that may have collections from DOI lands.” Text boxes are included for respondent to add the appropriate information.

Justification: This information is requested to ensure that all departments at an institution that may provide oversight for DOI collections are contacted during this initiative. This is especially important for large institutions with a number of departments organized by discipline and those with several buildings separated geographically.

- “If available, please attach any or all of the following documents that will help DOI better understand the scope and content of the DOI collections at your institution.”

Buttons to upload the following documents are provided: “NAGPRA summary”; “Other NAGPRA information”; “Repository Fee Schedule”; “DOI Collection Data”; “Collections Management Policy”; “Mission Statement”; “Additional Comments”; and “Other”.

Justification: This question affords a mechanism for the respondent to provide DOI with any additional relevant documents in an electronic format. Inclusion of this element eases the response burden as DOI gains critical information from these documents which should preclude the need for further clarification or extensive follow-up communications.

- “Comments” field.

Justification: This element allows the respondent to note any additional pertinent information concerning their institution, collections housed within it, or any other matters that it deems important.

3. 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 and specifically how this collection meets GPEA requirements.

This collection of information, to the greatest extent possible, uses electronic submission of responses, which is the preferred means of response. The use of electronic response methods reduces the burden to the public immeasurably. As the bulk of these responses are electronic—and all results are maintained electronically

in DOI database systems—this information collection meets the Government Paperwork Elimination Act’s (GPEA) requirements of Federal agencies to: “allow individuals or entities that deal with the agencies the option to submit information or transact with the agency electronically, when practicable, and to maintain records electronically, when practicable.” In addition, the use of electronic data allows DOI to make timely and effective use of this important information—facilitating the documentation and preservation of DOI museum collections on a reasonable and economical basis for the American public.

The information to be collected electronically includes:

- A. Catalog Records – This request is for electronic data in Microsoft Excel format using the fields described in question 2.
- B. Accession Records – This request is for electronic data in Microsoft Excel format using the fields described in question 2.

Note: If a non-Federal repository has paper accession and catalog records that have not been automated, DOI is only interested in obtaining an estimate of the number of paper records. DOI uses the estimate to develop a project proposal and funding request to financially support this work at a future date as resources permit.

- C. Checklist – An electronic version of the Checklist is used and is available online at <https://www.doi.gov/museum/policy/Museum-Directives>.
- D. Inventory – Requests for inventory data are transmitted by email or other electronic means. Responses are made in the same manner.
- E. Input Form – This form is internet-based.

4. 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 above.

This information request primarily seeks new information specifically about DOI museum collections that DOI does not currently possess. No other Federal Agency has responsibility for DOI’s museum collections, so there has never been a need for other agencies to request such information.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

As noted in Question #3, above, this collection of information, to the greatest extent

possible, uses electronic submission of responses. The use of electronic response methods significantly reduces the burden to small entities. At the same time, the DOI project manager and other DOI museum personnel are available to provide assistance by way of telephone or email if any respondent experiences difficulties with the electronic response methods.

DOI recognizes that respondents' catalog and accession data may not include all "DOI required data" elements (as noted above) and/or be in an electronic format. In these instances, DOI works with the non-Federal repository to determine the best format. Should a respondent be unable to initially provide these data due to staffing, funding, or other limitations, DOI accepts any information that can be provided without constituting an undue burden, such as item counts, numbers of accessions, and estimates. DOI then works in collaboration with the non-Federal repository to develop a work plan for DOI or DOI contract staff to gather any additional information that is needed.

Another method used to minimize the burden is the interval at which each of the information requests is required by the non-Federal repositories. Catalog Records and Accession Records are required once for initial delivery of the information and then periodically when records are updated. The Checklist is required once every five years. The Inventory is conducted every two years (or annually according to an individual bureau's policy of if the objects are controlled property). It is anticipated that DOI will request information from non-Federal repositories using the Input Form on a very infrequent basis, such as once every 7-10 years.

Finally, in order to ease the respondents' burdens to the lowest possible levels, DOI undertakes efforts to coordinate all data requests to the extent practicable.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information collection is not conducted, museum collections that belong to the American people, and for which DOI has management responsibility, will not be identified, documented, managed, and preserved in accordance with Federal laws, regulations, and policies. Museum collections and their associated documentation may become lost, stolen, missing, damaged, or destroyed. Important scientific and historic research in support of the public interest and Federal laws and regulations cannot be conducted. Educational programs, exhibits, publications, and other forms of outreach using these museum collections cannot be implemented.

If this information collection is not conducted, DOI also will be unable to address several important OIG recommendations regarding improved preservation, protection, and documentation of bureau museum collections.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly – Not Applicable**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it – Not Applicable**
- **requiring respondents to submit more than an original and two copies of any document – Not Applicable**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years – DOI policy and accepted U.S. museum standards require that all museum records (e.g. accessioning and cataloging records) are maintained for the long-term. This is required by professional museum standards regardless of this information collection.**
- **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 – Not Applicable**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB – Not Applicable**
- **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 – Not Applicable**
- **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law – Not Applicable**

8. 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 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

The initial agency notice (60-Day Notice) was published in the *Federal Register*, Volume 86, Number 9, January 14, 2021, page 3176-3177.

Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

One comment was received from a Federally recognized Indian tribe, Colorado River Indian Tribes. The Colorado River Indian Tribes do not hold DOI museum collections. The comment requested that DOI share information obtained from non-Federal repositories about certain DOI museum collections with affiliated tribes. The comment did not include reference to cost or 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.

DOI contacted curatorial staff at nine non-Federal repositories as this information collection request was developed (see below). The non-Federal repository staff provided the following (aggregated) responses to DOI:

- Availability of data: The types of data that DOI is requesting concerning its collections at non-Federal repositories consists of the same information that is collected and maintained by museums nationwide, in accordance with accepted U.S. museum standards. No commentors found issue with availability of requested data submission suggesting that these data are either already available or can be easily developed. Some comments came in that were not applicable to this collection or that acknowledged the comment was in reference to an outlier situation. Consequently, action was not taken.
- Frequency of collection: No commentors found issue with frequency of collection suggesting that the frequency of collection was appropriate given that all of the information elements consist of standard museum reporting and documentation information.
- Clarity of Instructions and Recordkeeping, Disclosure/Reporting format, and Data Elements to be reported: No commentors found issue with clarity of instructions and recordkeeping, disclosure/reporting format, and data elements to be reported. All information elements (see above) consist of standard museum reporting and documentation datasets.

Non-Federal Facilities Consulted by DOI

- 1) Arizona State Museum, Tucson, Arizona
Head of Collections, May 14, 2021

- 2) Museum of Indian Arts and Culture, Santa Fe, New Mexico
Curator of Archaeological Research Collections, May 14, 2021
- 3) Denver Museum of Nature and Science, Denver, Colorado
Anthropology Collections Manager, May 12, 2021
- 4) University of New Mexico Maxwell Museum of Anthropology, Albuquerque,
New Mexico
Archaeology Senior Collections Manager, May 12, 2021
- 5) University of Wyoming Archaeological Repository, Laramie, Wyoming
Collections Manager, May 12, 2021
- 6) Colville Confederated Tribes Nespelem Curation Facility, Nespelem,
Washington
Collections Manager, May 12, 2021
- 7) San Bernardino County Museum, Redlands, California
Curator of Anthropology, May 12, 2021
- 8) Florida Museum of Natural History, Gainesville, Florida
Vertebrate Paleontology Collections Manager, May 14, 2021
- 9) Idaho Museum of Natural History, Pocatello, Idaho
Life Science Collections Manager, May 14, 2021

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

Not Applicable.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not Applicable.

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

Not Applicable.

- 11. 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.

Not Applicable.

12. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **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.**

The annualized cost to respondents for the hour burdens for the collection of information in this request was formulated using an hourly wage of \$24.04, plus 25% (\$6.01/hour) for benefits; which totals \$30.05 per hour. This amount is the national estimated median hourly wage of a Museum Technician and Conservator, as published by the U.S. Bureau of Labor Statistics in the May 2020 edition of *Occupational Employment and Wages*, "Occupation Code 25-4013: Museum Technicians and Conservators," available on the web at: <https://www.bls.gov/oes/current/oes254013.htm>.

Catalog Records Burden: Six of the non-Federal repositories contacted by DOI were able to provide the time required to submit catalog data to DOI. "Submission time" encompassed finding existing electronic records, exporting the records, and emailing the records to the requesting DOI unit. The reported times varied from 0.25 hours to eight hours, with an average of 1.6 hours. The range of time spent can be attributed to the quantity and types of collections and data management and export methods. This increase in time is likely attributable to

actual numbers, rather than estimates, and more clearly defined parameters for calculation of burden hours.

Accession Records Burden: Six of the non-Federal repositories contacted by DOI provided the time required to submit accession data to DOI. “Submission time” encompassed finding existing electronic records, exporting the records, and emailing the records to the requesting DOI unit. The reported time varied from 0.25 hours to eight hours, with an average of 2.3 hours. The range of time spent can be attributed to the quantity and types of collections and data management and export methods. This increase in time is likely attributable to actual numbers, rather than estimates, and more clearly defined parameters for calculation of burden hours.

Checklist Burden: Three of the non-Federal repositories contacted by DOI provided the time required to complete the Checklist. The reported time varied from 0.17 hours to eight hours, with an average of three hours. The range of time spent can be attributed to the differing parties that conducted the checklist and the size, complexity, and knowledge of the space(s) evaluated.

Input Form Burden: Six of the non-Federal repositories contacted by DOI provided the time required to complete the Input Form. The reported times varied from one to 80 hours, with an average of 32.5 hours. The wide variance in time is attributable to the size of the institution and collections; complexity, age, and documentation of the collections; repository staff’s understanding of collection and length of employment; and the degree to which they participated in completing the form (e.g., best guess, brief review of records, or in-depth review and discussion). The increase in time is likely attributable to estimates, rather than actual numbers as several repositories contacted had not previously completed the survey.

Inventory Burden: Five of the non-Federal repositories contacted by DOI provided the time required to furnish inventory information to DOI for one object. The reported times varied from 0.33 hours to 0.50 hours per object, with an average of 0.43 hours. The inventory burden time varies due to the discipline of the object (e.g., archaeology, biology); the organization of records and collections; and familiarity with the records and collections. The sample inventory request can range from one object to 203 objects (if the repository has over 150,000 objects from one bureau unit), with an average of 0.43 hours to 87 hours to complete the task. See DOI Museum Property Directive 21, *Inventory of Museum Collections, Appendix I, Random Sampling Table*.

Grand Total Annual Burden Hours = 4,155
Grand Total Annual Burden Cost = \$124,858

See Table 1, below, for total burden for each information request.

| Collection | Burden (hours) | Burden (cost) | Annual Requests | Annual Burden (hours) | Annual Burden (cost) |
|-------------------|----------------|---------------|-----------------|-----------------------|----------------------|
| Catalog Records | 1.6 | \$48.08 | 100 | 160 | \$4,808 |
| Accession Records | 2.3 | \$69.12 | 100 | 230 | \$6,912 |
| Checklist | 3 | \$90.15 | 100 | 300 | \$9,015 |
| Input Form | 32.5 | \$976.63 | 100 | 3,250 | \$97,663 |
| Inventory | 0.43 | \$12.92 | 500 | 215 | \$6,460 |
| | | TOTALS | 900 | 4,155 | \$124,858 |

Table 1: Annual Burden for DOI Museum Information Collection

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * 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 and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). 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.

There are no estimated non-hour cost burdens for the respondents.

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 expense that would not have been incurred without this collection of information.

The annualized cost to the Federal government for the information requests in the ICR is estimated at \$83,159 for year one and per annum thereafter.

The hourly burden estimates are multiplied by the hourly mean wage for a Museum Curator, GS-1015-09/04. According to the 2021 General Schedule Salary Table published by the U.S. Office of Personnel Management (OPM), this hourly wage is \$24.29, plus a benefit multiplier of 1.6 (\$14.57 per hour) for benefits, which totals \$38.86 per hour. See the GS salary table on the OPM website at:

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf.

- **Catalog and Accession Records Burden:** Each DOI unit that was contacted supplied hour burdens for uploading or downloading and quality control of accession and catalog data. (In the ICMS catalog database system, catalog records are linked to the corresponding accession records. When records are uploaded into or downloaded from ICMS, the system combines both datasets into a unified submission of catalog data. As a result, there are no separate Federal burden estimates solely for accession records burden.) The estimates varied from four to 10 hours, with an average of 5.5 hours.
- **Checklist Burden:** The estimates varied from one to eight hours, with an average of 2.3 hours.
- **Input Form Burden:** Input Form data management was carried out by staff from the DOI Museum Program and/or contract staff. DOI estimates two hours of staff time to upload data from the web Input Form, conduct quality control, and initiate any other necessary follow-up work.
- **Inventory Burden:** The estimates varied from one to four hours, with an average of 2.4 hours.

See Table 2, below, for total DOI staff burden for each information request.

| Collection | Burden (hours) | Burden (cost) | Annual Requests | Annual Burden (hours) | Annual Burden (cost) |
|-------------------------------|----------------|---------------|-----------------|-----------------------|----------------------|
| Catalog and Accession Records | 5.5 | \$213.73 | 100 | 550 | \$21,373 |
| Checklist | 2.3 | \$89.38 | 100 | 230 | \$8,938 |
| Input Form | 2 | \$77.72 | 200 | 400 | \$15,544 |
| Inventory | 2.4 | \$93.26 | 400 | 960 | \$37,304 |

| | | | |
|---------------|------------|--------------|-----------------|
| TOTALS | 800 | 2,140 | \$83,159 |
|---------------|------------|--------------|-----------------|

Table 2: Annual DOI Staff Burden for DOI Museum Information Collection

Grand Totals:

- **Annual Federal Burden Hours: 2,140**
- **Average Annual Federal Burden Cost = (Year 1: \$83,159 + Year 2: \$83,159 + Year 3: \$83,159) / 3 = \$83,159**

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

Burden hour for DOI Museum Information Collection for Catalog Records increased from one hour to 1.6 hours; Accession Records increased from one hour to 2.3 hours; Inventory decreased from five hours to 0.43 hours; Checklist increased from two hours to three hours; and Input Form increased from 12 hours to 32.5 hours. Adjustments in Catalog Records, Accession Records, Inventory, Checklist, and Input Form burden hours are based on outreach to respondents (Question 8).

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.

Not Applicable. Results are not published but are used internally to maintain DOI Museum accountability as required by law.

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

The OMB ID and corresponding expiration date appears on all forms and instruction sets.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exceptions.