

## **Part A. Justification: IMLS Collections Assessment for Preservation Forms, OMB Control Number 3137-NEW**

### **1. Circumstances Making the Collection of Information Necessary**

The Institute of Museum and Library Services (IMLS) requests approval to collect information as part of its Collections Assessment for Preservation (CAP) program under the Paperwork Reduction Act. The CAP program allows up to two qualified conservators, who serve as assessors, to study of all of a museum's collections, buildings, and building systems, as well as its policies and procedures relating to collections care. Participants who complete the program receive a report prepared by the assessor(s) with prioritized recommendations to improve collections care.

The purpose of this information collection is to support the administration and implementation of the CAP program. The seven forms submitted for public review in this Notice are:

1. An Application Form to collect information about museums that wish to be considered for enrollment in the program;
2. An Assessor Application Form to collect information necessary to determine whether potential conservators/assessors have sufficient qualifications to participate in the program ; and
3. A Site Questionnaire to provide more detailed information about a museum to prepare for its assessment once it is accepted for participation in the program.

Four forms to collect feedback from participating museums and conservator/assessors following their participation in the program:

4. An Application Feedback Form for museums to share information about how they heard about the program and to provide feedback about the application process;
5. An Assessor Feedback Form for conservators/assessors to share their experiences with the CAP assessment;
6. A Participant Feedback Form to help IMLS and the program administrator gain a better understanding of the experience of museums after participating in the program and to help improve the program for future years; and
7. A Follow-Up Survey for CAP participants to share their longer-term experiences as a result of program participation to help IMLS and the program administrator make improvements over time

This action is to request approval for using the forms for the next three years. In a 2018 request, clearance for these forms was inappropriately tied to the Notice of Funding Opportunity for the Collections Assessment for Preservation Program (3137-0103). This request is being made to split the forms from the NOFO and to request a new clearance number for the forms alone.

*Legislative Authorization:* IMLS is the primary source of federal support for the nation's libraries and museums. It advances, supports, and empowers America's museums, libraries, and related organizations through grant making, research, and policy development. The CAP program is designed to support the advancement of collections stewardship and access in museums across the country in keeping with its federal authorizing legislation (20 U.S.C. § 9101 *et seq.*; in particular, § 9162 (National leadership grants) and § 9173 (Museum services activities)).

### **2. Purposes and Uses of the Data**

The information collected through these forms will be used by the agency and the cooperator to identify alignments with agency-level goals and objectives, validate participant and assessor eligibility, prepare assessors for their site visits, analyze the degree to which the program is meeting the needs and expectations of participants and assessors, and to gather feedback on perceptions of the benefits that accrue to program participants. It will also be used by the agency for strategic planning, performance analysis and to provide information to the Administration and to Congress.

### **3. Use of Improved Information Technology**

IMLS is committed to the use of information technology to improve the efficiency and effectiveness of its operations and programs, while reducing burden on potential CAP program participants, assessors, and IMLS as well as cooperator staff. These documents are web-based forms that can be completed online via application software and SurveyMonkey. Completing these forms electronically allows for faster responses, reducing participant/respondent burden. However, IMLS provides the option of requesting paper-based forms for the benefit of small museums that have limited or no access to technology.

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

All IMLS externally facing documents are annually reviewed through an internal clearance process, which requires review by several different offices within the agency, including the program offices, the Office of General Counsel, and the Office of Grants Policy and Management. This annual review process protects against duplication. The CAP program is a unique offering for small- to medium-sized museums, and the information collected is specific to the participation of small- to medium-sized museums and conservators/assessors. There is no other program with the same goals, objectives, or approach, and thus we are confident that this information collection is not duplicated.

### **5. Methods Used to Minimize Burden on Small Businesses**

Participation is entirely voluntary. No small businesses are impacted, but most potential participants in this program are from small non-profit organizations. Every effort has been made to streamline processes and instructions and to simplify the application and reporting processes. The agency's internal clearance process ensures that no undue burden is placed on any applicant for IMLS funding.

IMLS provides the option of requesting paper-based forms for the benefit of small museums that have limited or no access to technology. This service actually reduces the burden on small museums that may be managed by volunteers and may not have current technology.

### **6. Consequences of Less Frequent Data Collection**

This collection of information is essential to IMLS in meeting its statutory mission to award Federal financial assistance under the Museum and Library Act (20 U.S.C. Section 9101 *et seq.*). Each application cycle of the CAP program engages new participating museums, therefore requiring the use of five of the forms for each participant. Assessor Application Forms, however, need only be filled out once by conservators/ assessors who may participate in multiple application cycles over several years. Assessor Feedback Forms are completed by each assessor each year.

The CAP program could not function effectively without the application forms to select eligible participants and site questionnaires to prepare them for the assessors' site visit. The feedback forms are necessary to gather information that is used to improve program services each year.

### **7. Special Circumstances of Data Collection**

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

### **8. Consultation and Feedback from Outside the Agency**

Each of these forms has been reviewed by a steering committee of subject matter experts to ensure that the information requested is both clearly defined and necessary to support the program. The 60-day notice for the IMLS Collections Assessment for Preservation Forms (3137-NEW) was published on January 13, 2021 in the Federal Register (86 FR 2704). No comments were received. A 30-day notice requesting comment for the OMB clearance was published in the Federal Register on March 25, 2021 (86 FR 15968).

## 9. Payments or Gifts to Respondents

No payments or gifts are provided to any respondent.

## 10. Assurance of Confidentiality

No assurance of confidentiality is provided. Files are subject to FOIA requests and are handled on a case-by-case basis.

## 11. Sensitive Questions

There are no questions of a sensitive nature.

## 12. Estimate of Hour Burden to Respondents

The estimated total number of respondents for the seven forms is 710 per year. Each form will be completed once. Based on estimates of between two minutes and four hours required per form to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of each form, the total estimate of burden hours is 950.

Preparing/Submitting CAP Program Forms	Number of Respondents	Time per response (in hours)	Total Burden Hours
CAP Application Form	100	4.00	400
CAP Assessor Application Form	10	1.00	10
CAP Site Questionnaire Form	100	4.00	400
CAP Application Feedback Form	100	0.16	16
CAP Assessor Feedback Form	200	0.33	66
CAP Participant Feedback Form	100	0.33	33
CAP Follow-up Survey Form	100	0.25	25
<b>TOTALS</b>	<b>710</b>		<b>950</b>

## 13. Estimate of Cost Burden to Respondents

The total estimated cost to potential participants and assessors is \$27,008.50 for all seven forms. The average cost per hour is based on \$28.43, the Bureau of Labor Statistics average mean hourly range for a museum curator.

The two cost components for total capital/start-up and operation/maintenance/purchase of services are not applicable.

## 14. Annualized Cost to the Federal Government

The total cost to the Federal Government is \$4,271.82 for the seven forms. This is based on 98 hours required to process 710 forms and using an average salary figure for agency and cooperator staff of \$43.59 per hour.

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

In a 2018 request, clearance for these forms was inappropriately tied to the Notice of Funding Opportunity for the Collections Assessment for Preservation Program (3137-0103). This request is being made to split the forms from the NOFO. For comparison, however, the Estimate of Hour Burden to Respondents in 2018 was 392 hours, and the Estimate of Cost Burden to Respondents was \$10,731.76. Details of the changes are presented in the chart below.

The decrease in number of respondents using the CAP Assessor Application Form reflects the fact that the program now has a large enough group of assessors who have been approved that we do not expect more than 10 new assessor applicants each year for the next three. The increase in number of respondents using the Site Questionnaire Form, the Participant Feedback Form, and the Follow-Up Survey reflects our target increased target of 100 applicant museums per year (as opposed to 75). The increase in number of respondents using the Assessor Feedback form reflects the now standard practice of having two assessors visit each participant museum. This has always been an option, but our experience has been that the majority of museums request two assessors rather than one. These changes result in a net reduction of 65 respondents.

Increases in total burden hours reflect the improved accuracy in the estimate of the time required to complete the forms based on actual experience. The largest increases in time required to complete a form are in the Application Form (from 1 to 4 hours), the Site Questionnaire (from 1 to 4 hours), and the Assessor Application Form (from 0.25 to 1 hour). The total in burden hours for the Assessor Application Form, however, shows a significant decrease due to the smaller number of Assessor Applicants we are estimating.

Increases in cost largely track the increases in hours but there has also been an increase in the average hourly wage for a Museum Curator from \$27.38 to \$28.43 per hour.

<b>Preparing/Submitting CAP Program Forms</b>	<b>Change in Number of Respondents</b>	<b>Change in Total Burden Hours</b>	<b>Change in Cost</b>
<b>CAP Application Form</b>	0	300	\$8,632.00
<b>CAP Assessor Application Form</b>	-190	-40	-\$1,085.70
<b>CAP Site Questionnaire Form</b>	25	250	\$7,262.00
<b>CAP Application Feedback Form</b>	0	0	-\$1.88
<b>CAP Assessor Feedback Form</b>	50	28	\$848.88
<b>CAP Participant Feedback Form</b>	25	14	\$424.44
<b>CAP Follow-up Survey Form</b>	25	6	\$197.00
<b>TOTALS</b>	(65)	558	\$16,276.74

#### **16. Statistical Usage**

Not applicable.

#### **17. Approval for Not Displaying the Expiration Date for OMB Approval**

No exemption from the requirements to display the expiration date for OMB approval of the information collection is being requested for the CAP forms. The OMB approval number and expiration date will be displayed on each of these forms.

#### **18. Exceptions to the Certification Statement**

There are no exceptions to the certification statement.