

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 75 million objects and scientific specimens, and over 92,000 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 owned and managed by DOI bureaus and offices (bureaus). Although the majority of DOI museum collections are housed in DOI bureau facilities, at least 10 percent are located at more than 1,000 non-Federal

repositories, primarily state and tribal institutions, museums, and university departments. Most of DOI museum collections housed in non-Federal repositories resulted from projects on Federal lands, and include objects from the disciplines of archaeology, biology, geology, and paleontology, as well as associated project documentation (archives or associated records). This information collection request is directed to these non-Federal repositories that house DOI museum collections.

Upon request by DOI bureaus, voluntary submittal of the information identified below from non-Federal repositories supports DOI's management of its museum collections, as well as compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) where applicable. DOI bureaus may request information within the following categories:

- A. Museum records created to manage DOI museum collections, such as accession, catalog, inventory, loan, and deaccession records, and backups of collection management systems or other software/programs.
- B. Associated records (archives) generated by the activity of collecting and analyzing DOI museum collections.
- C. Access and use of DOI museum collections, such as use requests, analyses, physical and virtual exhibits, online catalogs and finding aids, presentations, and publications resulting from use.
- D. Objects newly identified as under DOI ownership and possible NAGPRA human remains or cultural items in DOI museum collections.
- E. Improved management and care recommendations, including considerations for Duty of Care requirements consistent with NAGPRA.
- F. Reports of damaged, deteriorated, missing, or stolen objects.
- G. Core management and planning documents, such as scope of collection statement, emergency management, integrated pest management, security, and housekeeping plans.
- H. Partnerships, funding, or commercial sponsorships that may involve DOI museum collections.
- I. Facility Checklist for Spaces Housing DOI Museum Property (Checklist) to capture current environmental, security, and other management controls in place to document and safeguard DOI museum collections and to provide recommendations for improvements.
- J. 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 and depth of information about repositories, scope and types of DOI museum collections in the repositories, DOI bureaus with which the collections are associated, status of documentation and NAGPRA compliance, and availability of objects and archives for research and other uses.

DOI museum collections cared for in non-Federal repositories 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. Additionally, permits and other agreements for the collection of artifacts and specimens from public lands managed by DOI further affirm Federal ownership. Federal regulations and DOI policy require that all permittees (authorized individuals) conducting research or performing compliance activities on DOI-managed lands must ensure that any retained museum artifacts or specimens collected during a project are: 1) accessioned and cataloged according to DOI standards in the Interior Collection Management System (ICMS), its successor the Museum Collection Management System (MCMS), or another collection management database from which the necessary data can be imported into ICMS or MCMS; and 2) housed in an appropriate museum repository that meets professional and DOI museum standards. These requirements help to establish and maintain accountability, as well as ensure the collections' long-term preservation, protection, and availability 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 curation 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:

- Federal responsibilities pertaining to certain collections, as established in law.
- Permanent Federal ownership of collections, as established in common law, Federal laws, regulations, and policy.
- Mandated documentation and preservation responsibilities of the researcher, affiliated institution, and the repository where the collections were/are ultimately housed.
- 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.

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

- 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.);
- Archaeological 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 Archeological 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).

DOI implements these laws and regulations using the following DOI policies and findings:

- Interior Property Management Directives and DOI Acquisition, Arts, and Asset Policy
- 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
- Fiscal Year 2010 Office of Inspector General (OIG) report, *Department of the Interior, Museum Collections: Accountability and Preservation* (C-IN-MOA-0010-2008)

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 DOI to uphold its management responsibilities for museum collections, as well as NAGPRA compliance where applicable, as mandated by Federal law, regulations, and DOI policy. DOI serves as a steward to protect and preserve these collections for present and future generations, while also supporting use of the collections for research, public education, and science-based resource management decisions. While the

examples provided in A. through H. (below) demonstrate the information that DOI hopes to collect, DOI accepts the data in any format (e.g., report, spreadsheet, or CSV) that is most convenient for the institution providing it to minimize the burden on the public. For I. and J. (below), specific collection instruments are provided to gather and submit the information to DOI.

DOI is interested in obtaining information, which it currently lacks, for all DOI museum collections housed in non-Federal repositories. The information includes the data sets prescribed in DOI policy and other pertinent information about DOI museum collections.

If a non-Federal repository's records do not include all requested data, the data that does exist and can be reasonably provided to DOI is sufficient. If submission of any of the data is unduly burdensome (for example, if a non-Federal repository's museum records have not been digitized), DOI will work with the non-Federal repository to develop a mutually acceptable approach for DOI to acquire the data.

It is expected that non-Federal repositories will not always have new information for each of the data categories identified below to provide to DOI upon request. If no such information has become available since the last request from DOI, clarification or a negative response from non-Federal repositories is appreciated.

All objects, specimens, and archives in DOI museum collections must be documented in ICMS/MCMS in accordance with DOI policy. If information is provided by non-Federal repositories in an electronic format (e.g., Excel or CSV), then DOI can more easily import that data into ICMS/MCMS. Non-Federal repositories may also voluntarily elect to use ICMS/MCMS, at no cost, to document DOI museum collections.

The information that DOI may ask non-Federal repositories to voluntarily provide about DOI collections consists of the following data categories:

A. Museum Records: Museum records are created to manage DOI museum collections, such as accession, catalog, inventory, loan, and deaccession records, and backups of collection management systems or other software/programs.

Accession and catalog records document all museum objects under the ownership of DOI. 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. Cataloging is the action of assigning a unique identifying 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

objects and museum collections.

Accession and 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 within catalog records may be as important as the objects themselves.

Contemporary DOI museum collections are often accessioned and cataloged prior to deposit at a non-Federal repository, or completed by the repository, as a condition of a permit. Conversely, legacy DOI museum collections may require accessioning and cataloging to be completed, often by the non-Federal repository housing the collection, and may be included as a requirement in a curation agreement or similar instrument. If the collections have not yet been accessioned and/or cataloged, such information is extremely useful to the DOI unit as it establishes and prioritizes its annual work plan, schedules, and budget requests.

Inventory records document the act of physically locating all or a random sample of the museum objects for which a DOI unit is responsible and verifying (and updating as necessary) information in the related catalog or accession records. DOI units that manage museum property must conduct each of the following three types of inventories on an annual or biennial basis, as noted:

- **Cataloged Objects Inventory:** All cataloged objects (or a statistical random sample) must be inventoried every two years, at a minimum.
- **Controlled Property Inventory:** All museum objects that are controlled property (all firearms and especially significant and/or valuable objects) must be inventoried annually.
- **Accessions Inventory:** All accessioned objects that have not yet been cataloged (or a statistical random sample) must be inventoried every two years, at a minimum.

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

- Confirm the current location, object count, and condition 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 non-Federal repositories.
- Conduct the inventory of DOI museum collections at the non-Federal repository, in keeping with the responsibilities specified in a curation agreement or similar instrument.
- Assist a DOI staff member in carrying out the inventory at the non-Federal

repository using the method provided by the DOI staff member.

Loan records document the temporary assignment of custody of DOI museum objects to another entity on a short-term basis (three years or less). Outgoing loans are typically made to advance a bureau's goals of research, exhibition, preservation, public outreach, education, or interpretation. Loans of DOI objects or museum collections must be for official purposes only and documented in a loan agreement or similar instrument. Loans to private individuals and/or for private pecuniary gain are prohibited. Non-Federal repository staff may be responsible, as a requirement in a curation agreement or similar instrument, to review and approve/deny loan requests for DOI museum objects. This may also include establishing loan agreements and creating/updating loan and catalog records.

Deaccession records document the formal process by which an accessioned object or group of objects is permanently removed from a museum collection. DOI may voluntarily request a non-Federal repository to provide existing deaccession records, however, it is unlikely a non-Federal repository would be asked to process new deaccession actions.

Backups of collection management systems or other software/programs may include all available information about DOI museum collections in an electronic format. DOI may ask non-Federal repositories to provide a backup of their existing electronic DOI museum collections data, if available, rather than specific data sets to help reduce the burden on non-Federal repositories.

B. Associated Records (Archives): Associated records include all documentation generated by the activity of collecting and analyzing DOI artifacts, specimens, or other resources that are museum property. Associated records are "associated" with objects collected and analyzed during such activities and must be maintained as museum property. Examples include site forms, field notes, drawings, maps, photographs, slides, negatives, films, video and audio cassette tapes, oral histories, object inventories, laboratory reports, manuscripts, reports, and printouts of computerized data. Electronic or digital documentation stored on a computer or server or stored on media, such as computer cards, tapes, disks, diskettes, CDs, and DVDs, are included. Associated records are a subset of archives and may include physical and/or digital copies.

Non-Federal repositories may be asked to provide copies of associated records which DOI is currently lacking. Digital copies will most often be requested as they become available through other efforts such as accessioning or cataloging.

C. Access and Use: DOI museum collections are available for research, educational, and ceremonial/religious uses, subject to the terms and conditions necessary for their preservation and protection, applicable laws and regulations,

and DOI policy. Access and use of DOI museum collections in non-Federal repositories may include use requests, analyses, physical and virtual exhibits, online catalogs and finding aids, presentations, and publications resulting from use. The information, which DOI is seeking on a voluntary basis from non-Federal repositories, may include data identifying the objects involved, purpose/project, name and affiliation of the user, use dates, and resulting analyses or publications.

DOI's mandate of preservation and access requires a careful balance between providing access for exhibits, research, and education with long-term preservation. This information will allow DOI to document how DOI museum collections are used, evaluate areas in need of improvement, promote the ongoing benefit DOI museum collections provide for research and education, generate ideas and streamline efforts to increase use of DOI museum collections in non-Federal repositories, and advocate for increasing public awareness of DOI collections.

- D. Newly Identified Objects:** Information regarding objects newly determined to be, with available information, under the ownership of DOI (or a different DOI bureau than originally reported/recorded.) Information associated with legacy collections may require further investigation to confirm the owner identified in the record. If further investigation creates an undue burden on a non-Federal repository, DOI will work with the non-Federal repository to develop a mutually acceptable approach for DOI to acquire information confirming DOI ownership.

Information regarding possible NAGPRA human remains or cultural items in DOI museum collections. This information will support fulfillment of DOI's management responsibilities for objects or museum collections previously unknown to be under DOI ownership held at non-Federal repositories and support compliance with NAGPRA for possible human remains or cultural items in DOI collections. NAGPRA provides a process for museums and Federal agencies to return certain Native American human remains and cultural items to lineal descendants, culturally affiliated Indian tribes, and Native Hawaiian organizations. Non-Federal repositories should provide information to DOI as it becomes available in compliance with NAGPRA.

- E. Management and Care Recommendations:** Information pertaining to recommendations DOI may authorize or help to implement to improve the management and care of DOI museum collections housed at non-Federal repositories. This may include considerations for Duty of Care requirements consistent with NAGPRA for possible or known NAGPRA human remains and/or cultural items in DOI collections housed at non-Federal repositories.

This information, when available, will help DOI to fulfill its management responsibilities for DOI museum collections, as well as NAGPRA human remains

and cultural items, housed in non-Federal repositories consistent with applicable laws and regulations, DOI policy, and professional museum standards and practices.

- F. Reports of Damaged/Deteriorated/Missing/Stolen Objects:** Information regarding the discovery of damaged, deteriorated, missing, or stolen objects and/or associated records (archives) within DOI collections. This could also include recommendations for necessary conservation treatments. Identification of these issues could occur through various collection management activities performed by non-Federal repository staff, including during a physical inventory of DOI collections.

This information, if applicable, will help to inform DOI of any needed actions to improve the care and management of DOI collections at non-Federal repositories for their continued preservation and protection.

- G. Management/Planning Documents:** Copies of core management and planning documents for the non-Federal repository, such as scope of collection statement, emergency management, integrated pest management, security, and housekeeping plans, to help demonstrate professionally sound management of DOI museum collections housed at the repository.

DOI may ask non-Federal repositories to provide copies of these management and planning documents before depositing DOI museum collections at the repositories and any updated copies in the future. This information may also be requested as part of the facility evaluation process identified in I. (below.)

- H. Partnerships/Sponsorships:** Information pertaining to partnerships, funding, or commercial sponsorships that may involve DOI museum collections. For example, this could include volunteer programs, special projects, or short-term loans for cataloging or re-housing DOI museum collections, designing exhibits, analysis and research, or publications.

This information will allow DOI to track collaborative efforts, promote the ongoing benefit DOI collections provide for research and education, generate ideas and streamline efforts to increase use of DOI collections in non-Federal repositories, and advocate for increasing public awareness of DOI collections.

- I. 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 and protection requirements specified in DOI policy. DOI must complete a Checklist for each DOI and non-DOI, including 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 evaluations when a non-Federal repository houses collections from more than one DOI bureau and/or unit. In these instances, DOI typically coordinates its efforts Department-wide, and conducts a single evaluation using the Checklist that satisfies all DOI bureau/unit requirements.

If a non-Federal repository 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 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 repository. Non-Federal repository staff are only asked to complete the Checklist if a DOI staff member is unable to visit the repository. The Checklist is included in this information collection request to allow DOI to ask for assistance with completing the Checklist.

During the 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, 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 repository.

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 repository, which corresponds to a rating of “Good”, “Fair”, or “Poor”.

In addition to tracking compliance with DOI 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 fiscal

year 2015.

The Checklist consists of the following elements, all of which are required in DOI policy. 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.

2. “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 and facilitates future correspondence with the non-Federal repository.

3. “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.

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 and facilitates future correspondence with the appropriate staff at the non-Federal repository.

5. “AAM Accreditation 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 or store DOI museum objects in their offices.

7. “Comments”

Justification: This text box is to note general 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 | Tornado |
| Fire, naturally caused | Severe windstorm |
| Flooding, human-caused | Crime |
| Flooding, naturally caused | Civil unrest |
| Earthquake | Other” |
| Hurricane | |

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) identification and training of 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 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: 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 local fire code, codes and standards of the National Fire Protection Association (NFPA), 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 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 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 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 and subject 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 as 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 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 evaluated using 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."

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

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, 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, labeled, 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, labeling, 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 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.

J. 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 and natural history specimens) have been collected from public lands administered by DOI by university- and museum-based scientists and researchers and sent to various universities and museums (along with associated documentation) for research, long-term curation, and exhibit purposes. In many instances during the 20th century, the supporting chain-of-custody documentation is missing, inadequate, or was never prepared. (Today, these activities are documented and controlled by permit at the individual DOI unit level.) 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 fiscal year 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.” DOI 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.

DOI 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 or confirmation. In response, DOI developed the Input Form as a means for the bureaus to obtain this needed information through efforts of the DOI Museum Program. 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.

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, protection, 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 is included as well):

“Institution” name and “Address”, “Completed by”, including:

- o “Title”, “Email”, and “Telephone (xxx-xxx-xxxx)”.
- o “Official Contact (if different)”, “Title”, “Email”, and “Telephone”.

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 well as 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 DOI policy. It also facilitates future correspondence with the non-Federal repository.

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

If the respondent answers “No”, no other responses are needed.

“If yes or maybe, please note which DOI bureaus (either known or suspected) below:

The following bureaus are listed with check boxes for “Y”, “N”, and “Maybe”: “Bureau of Indian Affairs”; “Bureau of Land Management”; “Bureau of Reclamation”; “Fish and Wildlife Service”; “National Park Service”; and “U.S. Geological Survey”.

There is also a check box for “We likely have 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.

2. “What is the basis for your assessment?”

Check boxes for possible answers include: “Current Curation Agreement”; “Long-term Loan Agreement”; “Project Permit Information”; “Contract for Curation”; “Memorandum of Understanding/Agreement”; “Institutional

History”; “Database or Catalog Records”; 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 museum 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 DOI 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.

3. “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 museum 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 DOI museum collections are preserved, protected, and made available for use in the most practical and fiscally responsible manner. This information should benefit both DOI and the non-Federal repositories housing DOI museum collections.

4. “Are any of the collections from DOI-administered lands accessioned?”

The respondent can choose “Yes” or “No”.

“If yes, what is the estimated percentage?” with space to enter an answer.

Justification: This information is requested to document if the DOI museum collections have been accessioned. DOI policy requires that all DOI museum 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.

5. “Are any of the collections from DOI-administered lands cataloged?”

The respondent can choose “Yes” or “No”.

Justification: This information is requested to document if DOI museum collections have been cataloged. DOI policy requires that all DOI museum 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.

6. “If you answered yes in #5, please provide the estimated: number of catalog records created by bureau; percent of cataloged objects by discipline; and percentage of paper vs. digital catalog records.”

There is a table with cells to note “Bureau(s)”, “Number of Catalog Records”, “% Cataloged”, “% Paper Only”, and “% Digital” for each discipline (“Archaeology”, “Archives”, “Art”, “Biology”, “Ethnography”, “Geology”, “History”, and “Paleontology”).

Justification: This information is requested to provide DOI with additional specific data pertaining to the level of documentation already carried out for DOI museum 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 DOI policy is accomplished.

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

The respondent can choose “Yes” or “No”. If “Yes” is selected, the respondent is asked: “If yes, what database system is used? (Please 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 space to note the name of the 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 DOI museum collections. In addition to catalog and accession data, ICMS/MCMS is used for museum inventories, loans, and other management activities.

8. “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” or “No”.

Justification: This information is requested to identify the presence of any DOI museum 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, and objects of cultural patrimony—to lineal descendants, 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 human remains and cultural items.
- o This information facilitates a more expeditious identification of any currently unknown NAGPRA human remains and cultural items.
- o Once any NAGPRA human remains and cultural items are identified, DOI can then work with the non-Federal repository to:

1. Consult with potentially affiliated lineal descendants, Indian tribes, and Native Hawaiian organizations.
 2. Establish cultural affiliations.
 3. Publish the required notices in the *Federal Register*.
 4. Repatriate NAGPRA human remains and cultural items.
9. “Has a physical inventory of collections from DOI-administered lands been completed?”

The respondent can choose “Yes” or “No”. If “Yes” is selected, the respondent is asked: “If yes, please note the type. The respondent can choose “Full”, “Partial”, or “Random Sample”.

“Date of the most recent inventory”, with space to enter an answer.

Justification: DOI policy mandates that all DOI museum collections, whether housed in Federal 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 and assists in programming for this activity in future years. Additionally, 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.

The need to ensure that inventories of DOI museum collections housed in non-Federal facilities are carried out also was recognized in the fiscal year 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.]

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

The respondent can choose “Frequently”, “Sometimes”, or “Never”.

Justification: This information is requested to document how DOI collections housed in non-Federal facilities are used. DOI policy 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 between providing access for exhibits, research, and education with long-term preservation. 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.

11. "Do you continue to accept collections from DOI?"

The respondent can choose "Yes" or "No".

"If no, 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 space to provide an answer.

Justification: This question is included to determine if the non-Federal repository is still interested in assisting with the curation of DOI museum 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.

12. "Are there other departments at your institution that may have collections from DOI-administered lands? If so, please note:"

The respondent is asked to provide the department(s) name, contact(s), and email(s) for contact(s). 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 museum collections are contacted. This is especially important for large institutions with numerous departments organized by discipline and those with several buildings separated geographically.

13. "Please attach any documents that will help DOI better understand the scope and content of the DOI collections at your institution, such as:"

Check boxes include: “NAGPRA summary”; “Other NAGPRA information”; “Repository fee schedule”; “DOI collection data”; “Collections Management Policy”; “Mission Statement”; “Additional documents”; and “Other” with space to provide an answer.

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.

14. “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 information collection, to the greatest extent possible, uses electronic submission of responses, which is the preferred means of response and reduces the burden to the public immeasurably. As the bulk of these responses are electronic and are generated or gathered from electronic 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 submission of electronic data allows DOI to make timely and effective use of this important information. The majority of the results are maintained electronically in ICMS or its successor MCMS—facilitating the documentation and preservation of DOI museum collections on a reasonable and economical basis for the public.

The information to be collected electronically includes:

- A. Museum records created to manage DOI museum collections – This request is for electronic data (Microsoft Excel or CSV format preferred) transmitted by email or other electronic means.

- B. Associated records/archives generated by the activity of collecting and analyzing DOI museum collections – This request is for electronic/scanned copies of records transmitted by email or other electronic means.
- C. Access and use of DOI museum collections – This request is for electronic data (Microsoft Excel or CSV format preferred) transmitted by email or other electronic means.
- D. Objects newly identified as under DOI ownership and possible NAGPRA human remains or cultural items in DOI museum collections – This request is for electronic data (Microsoft Excel or CSV format preferred) transmitted by email or other electronic means.
- E. Improved management and care recommendations – This request is for electronic information (Microsoft Word or PDF format preferred) transmitted by email or other electronic means.
- F. Reports of damaged, deteriorated, missing, or stolen objects – This request is for electronic information (Microsoft Word, Excel, PDF format or a combination preferred) transmitted by email or other electronic means.
- G. Core management and planning documents – This request is for electronic information (Microsoft Word or PDF format preferred) transmitted by email or other electronic means.
- H. Partnerships, funding, or commercial sponsorships that may involve DOI museum collections – This request is for electronic information (Microsoft Word or PDF format preferred) transmitted by email or other electronic means.
- I. Checklist – An electronic version of the Checklist is used and is available online at <https://www.doi.gov/museum/policy/Museum-Directives> and transmitted by email or other electronic means.
- J. Input Form – This form is transmitted to a non-Federal repository by email or other electronic means with responses in the same manner.

Note: If a non-Federal repository has paper museum records and/or associated records that have not been automated or scanned, DOI is only interested in obtaining an estimate of the linear feet of paper records. DOI will use the estimate to develop a project proposal and funding request to financially support this work at a future date as resources allow. Additionally, if a non-Federal repository voluntarily agrees to use MCMS to document DOI museum collections in the repository's custody, then DOI can access a portion of the information identified in Item 2 above without causing any burden to the repository.

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 isn't 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 Item 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, DOI museum staff 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' data may not include all DOI required data elements and/or be in an electronic format. In these instances, DOI will work 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 creating an undue burden. DOI then works in collaboration with the non-Federal repository to develop a plan 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 of the non-Federal repositories. Most information is required once for initial delivery of the information and then periodically when records are updated. Other information may only need to be provided when alerting DOI to an inquiry, issue, or update. The Checklist is required to be completed or updated once every five years and is recommended to be completed by DOI staff in collaboration with non-Federal repositories. It is anticipated that DOI will request information from non-Federal repositories using the Input Form on an 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. For example, DOI recently implemented a new internal reporting tool that enables DOI to easily identify reported DOI bureau units (and points of contact) with known or suspected museum collections at the same repositories across the U.S. and abroad. This provides an opportunity for collaboration and coordination that did not previously exist without considerable effort.

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** – Federal regulations, accepted records management policy, DOI museum policy, and/or professional museum standards require that museum records (e.g., accessioning and cataloging records) and associated records are maintained for the long-term 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 89, Number 92, May 10, 2024, pages 40502-40503
<https://www.govinfo.gov/content/pkg/FR-2024-05-10/pdf/2024-10215.pdf>.

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.

No comments were received.

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 updated (see below). The non-Federal repository staff provided the following summarized 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. Some commentors found issue with availability of a portion of the requested data which can be attributed to the level of progress made to fully document the museum collections, while others did not report any issues suggesting that these data are either already available or can be easily developed.
- **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, Recordkeeping/Disclosure/Reporting format, and Data Elements to be reported: No commentors found issue with clarity of instructions, 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 Repositories Contacted by DOI

- 1) Museum of Northern Arizona, Flagstaff, Arizona
Director of Research and Collections, June 26, 2024
- 2) New Mexico Museum of Natural History and Science, Albuquerque, New Mexico
Curator of Paleontology, July 18, 2024
- 3) North Carolina State Museum of Natural Sciences, Raleigh, North Carolina
Collections Manager, July 1, 2024
- 4) University of Arizona Laboratory of Tree Ring Research, Tucson, Arizona
Curator of Collections, June 27, 2024
- 5) University of Denver, Museum of Anthropology, Denver, Colorado
Curator of Collections, June 26, 2024
- 6) University of Oklahoma, Sam Noble Museum, Norman, Oklahoma
Collection Manager, June 26, 2024
- 7) University of Oregon, Museum of Natural and Cultural History, Eugene, Oregon
Anthropological Collections Director, July 12, 2024
- 8) University of Wisconsin Geology Museum, Madison, Wisconsin
Museum Curator, July 19, 2024
- 9) University of Wyoming Archaeological Repository, Laramie, Wyoming
Collections Manager, June 26, 2024

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 \$26.39 plus

25% (\$6.60/hour) for benefits, which totals \$32.99 per hour. This amount is the national estimated mean hourly wage of a Museum Technician and Conservator, as published by the U.S. Bureau of Labor Statistics in the May 2023 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>.

Annual Report Burden: Four of the non-Federal repositories contacted by DOI were able to provide the time required to gather and submit typical annual report information to DOI (see A. through H. in Item 2 above). "Submission time" encompassed gathering information and existing electronic records, exporting records, consolidating information, and emailing the information and records to the requesting DOI unit. The reported times varied from eight to 48 hours, with an average of 29 hours. The range of time spent can be attributed to the specific request from a DOI bureau or unit; the quantity and types of collections; organization of records and collections; data management tools and export methods; and familiarity with the records and collections. This seemingly large increase in time is attributable to consolidation of categories from previous iterations of this information collection request and more clearly defined categories of information DOI bureaus may seek to collect from non-Federal repositories for improved management of museum collections.

Checklist Burden: Four of the non-Federal repositories contacted by DOI provided the time required to complete the Checklist. The reported time varied from four to eight hours, with an average of six hours. The range of time spent can be attributed to the various parties involved; familiarity with the Checklist; and the number, size, complexity, and knowledge of the space(s) evaluated.

Input Form Burden: Four of the non-Federal repositories contacted by DOI provided the time required to complete the Input Form. The reported times varied from two to 40 hours, with an average of 13.5 hours. The wide variance in time is attributable to the size of the institution and collections; familiarity with the collections; complexity, age, and documentation of the collections; previous experience with the form; and how the repository would approach completing the form (e.g., best guess, brief review of records, or in-depth review and discussion). The decrease in time is likely attributable to estimates, rather than actual numbers as several repositories contacted had not previously completed the survey.

Grand Total Annual Burden Hours = 8,475
Grand Total Annual Burden Cost = \$279,590.75

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

Collection	Burden (hours)	Burden (cost)	Annual Requests	Annual Burden (hours)	Annual Burden (cost)
Annual Report	29.0	\$956.71	225	6,525	\$215,259.75
Checklist	6.0	\$197.94	100	600	\$19,794.00
Input Form	13.5	\$445.37	100	1,350	\$44,537.00
		TOTALS	425	8,475	\$279,590.75

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 this information collection request is estimated at \$108,250 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 2024 General Schedule Salary Table published by the U.S. Office of Personnel Management (OPM), this hourly wage is \$27.06, plus a multiplier of 1.6 (\$16.24 per hour) for benefits, which totals \$43.30 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/2024/GS_h.pdf

Annual Report Burden: Each DOI unit that was contacted supplied hour burdens to upload data, conduct quality control, and initiate any other necessary follow-up work for the information received. The estimates varied from six to 13 hours, with an average of eight hours.

Checklist Burden: The estimates varied from one to eight hours, with an average of five hours.

Input Form Burden: Input Form data management is carried out by staff from the DOI Museum Program and/or contract staff. DOI estimates two hours of staff time to upload data, conduct quality control, and initiate any other necessary follow-up work.

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

Collection Table 2: Annual DOI	Burden (hours)	Burden (cost)	Annual Requests	Annual Burden (hours)	Annual Burden (cost)
Annual Report	8	\$346.40	225	1,800	\$77,940
Checklist	5	\$216.50	100	500	\$21,650
Input Form	2	\$86.60	100	200	\$8,660
TOTALS			425	2,500	\$108,250

Grand Totals:

- **Annual Federal Burden Hours: 2,500**
- **Average Annual Federal Burden Cost = (Year 1: \$108,250 + Year 2: \$108,250 + Year 3: \$108,250) / 3 = \$108,250**

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

Burden hour estimates for this DOI information collection seemingly increased for Annual Reports from 4.33 hours (Catalog, Accession, and Inventory) to 29 hours due to consolidating the three aforementioned data categories and expanding the categories to encompass additional information that may be requested by DOI

bureaus to ensure proper management of DOI museum collections (see A. through H. in Item 2 above); Checklist increased from three hours to six hours; and Input Form decreased from 32.5 hours to 13.5 hours. Adjustments in Annual Report, Checklist, and Input Form burden hours are based on outreach to respondents (see Item 8 above).

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, regulation, and policy.

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.

Not Applicable. The OMB ID and corresponding expiration date appears on all forms.

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

Not Applicable. No exceptions.