

4 March 2015

Office of Information and Regulatory Affairs
Office of Management and Budget
Attention: Department of the Interior Desk Officer
(sent by email (OIRA_Submission@omb.eop.gov))

Steven Floray
Office of Acquisition and Property Management
U.S. Department of the Interior
1849 C Street NW.,
MS 4262-MIB
Washington, DC 20240
(sent by email to Steven_Floray@ios.doi.gov).

Regarding: Proposed New Information Collection
OMB Control Number 1084- XXXX--Documenting, Managing and Preserving Department of the Interior Museum Collections Housed in Non-Federal Repositories
[80 FR 5775-5775]

Background:

In 2014 and 2015, the Interior Museum Program, Office of Acquisition and Property Management, Department of Interior published a notice in the Federal Register: "Department of the Interior Collection of Information Package: Documenting, Managing and Preserving Department of the Interior Museum Property Housed in Non-Federal Repositories." The first publication of this RFI was made in March 2014, a 60-day notice in the Federal Register, Vol. 79, No. 50, Friday, March 14, 2014, page 14525. The second, a 30-day notice, was published in the Federal Register, Vol. 80, No. 22, Tuesday, February 3, 2015, page 5774.

This is a request for permission from the Office of Management and Budget to approve an effort by the Interior Museum Program to seek information on museum collections managed by some of its non-Federal museum partners. The purpose of this is outlined in their supporting statement:

"This request for information will support the Department's mandated responsibilities for ensuring the proper management of DOI museum collections held at non-Federal repositories. It consists of the following:

- A. Catalog Records;
- B. Accession Records;
- C. Facility Checklist for Spaces Housing DOI Museum Property (Checklist);
- D. Inventory of Museum Collections (Inventory); and
- E. Input on Collections from Lands Administered by the U.S. Department of the Interior that are Located at Non-Federal Facilities (Input Form)."

This information is needed for the Interior Museum Program to comply with Congressional mandates requiring proof of the program's responsible management of museum collections from DOI-managed lands and properties.

Executive summary:

SPNHC is in support of the overall goal of this initiative, but has some objections and many concerns about its assumptions and its implementation, as detailed in this document.

In particular, we concur with the DOI's position that more information is needed for the effective tracking, accountability, and management of collections.

We strongly disagree, however, with the tone of and content of the statement that "museum collections that belong to the American people... 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."

This ignores the monumental work done to date by non-Federal repositories, more often than not in good faith and with no Federal funding, to curate, preserve, manage, and ensure the accessibility of these specimens and their associated data as a service to our Federal partners. It is symptomatic of what many in the community feel to be a high-handed approach by Federal agencies – the inherent assumption that the professional curatorial services provided, free of charge, by non-Federal repositories are in some way substandard.

SPNHC

The Society for the Preservation of Natural History Collections (SPNHC) is an international organization that represents natural history collection care professionals. As a Society, SPNHC is concerned with the care of natural history collections – well-curated collections are a critical foundation for scientific research. SPNHC was formed in 1985 and is recognized as a non-profit organization [501 (c) (3)] in the United States. It has around 500 members and its membership includes staff in both Federal and non-Federal institutions in the U.S.A., including many that hold Federal Collections under repository agreements. Strong pre-existing links between Federal collections staff and the wider collections-care community have been created and sustained through membership in SPNHC, and the Society is committed to facilitating the continuing dialogue between the government and non-government museum sectors.

General Comments

1. SPNHC is strongly supportive of any effort that improves the care, documentation, and housing of Federal collections.
2. Nonetheless, there are legitimate concerns within the museum community about how such improvements will be funded.
3. Pushing the financial and/or time burden onto non-Federal repositories as a series of unfunded mandates is not an appropriate solution. Neither is removal of collections from repositories unable or unwilling to accept such unfunded mandates.
4. A successful effort to improve the quality of care of Federal collections must be based on partnership between Federal agencies and non-Federal repositories and must recognize, from the outset, the extraordinary job performed by these repositories in caring for these collections over the past decades, at minimal cost to the taxpayer.

Specific Comments

1. Scope: there are some significant, and largely unanswered questions regarding the legal basis on which certain agencies (for example, the National Park Service) assert ownership over biological specimens; the regulations referenced in the supporting documentation relate primarily to archaeological, ethnographic, and paleontological collections. These concerns may affect the extent of the information reported.
2. Data provision: We welcome the fact that the DOI will be flexible in both the extent of the data sets collected and the format in which it is submitted. This is important for reducing the burden on respondents. Nonetheless, it is important to realize that not all institutions may be able to answer enquiries from the DOI in the time estimated.
3. Cataloging: It is not clear from the supporting documentation whether DOI cataloging and entry into ICMS is a DOI responsibility, to be undertaken by DOI or agency staff, rather than a repository responsibility (unless previously agreed). This needs to be clarified. If repositories were required to catalog on behalf of the DOI, this would be a heavy burden for which additional funding would be essential.
4. Accessioning: It is not clear from the supporting documentation whether DOI accessioning is a DOI responsibility, to be undertaken by DOI or agency staff, rather than a repository responsibility (unless previously agreed). This needs to be clarified. As with cataloging, this would place a heavy burden on already overloaded repositories and additional funding by DOI would be essential. In addition, there are concerns about non-Federal institutions being asked to take on the responsibilities of accessioning Federal specimens into Federal databases.
5. Repository checklist
 - a. While the supporting documentation appears to specify that completion of the DOI repository checklist is a DOI responsibility and will be undertaken by DOI staff, it needs to be stated more explicitly that this burden will not fall on repository staff (unless otherwise agreed).
 - b. We note, and welcome, the statement that the facility checklist is intended to provide a basis for collaborative discussion with DOI regarding support for the repository.
 - c. It would significantly reduce burden to respondents if an affirmative answer on AAM accreditation negated the requirement to complete the remainder of the Facilities checklist.
6. Inventory:
 - a. We note that inventories will normally be carried out by DOI staff, not repository staff (unless otherwise agreed). It needs to be confirmed that in the absence of an agreement to the contrary, repositories cannot be required by the DOI to carry out inventories. This is important to reduce burden on repositories and unfunded mandates. Currently inventorying requirements are set arbitrarily within DOI units, and there is no oversight of these requests, or means of appealing unreasonable requests.
 - b. We note that repositories may be asked to assist DOI staff members in carrying out an inventory using a method provided by the DOI staff. This is an open-ended statement. More detail should be provided on the likely time burden on the repository. The request for assistance could reasonably involve charges to DOI by the repository, depending on the method employed by the surveyor.
 - c. The supporting documentation states, with reference to 411 DM, DOI Museum Property Directive 3, *Required Standards for Documenting Museum Property*, DOI

Museum Property Directive 21, *Inventory of Museum Collections*, and Interior Property Management Directive 114-60.3, that certain categories of information and verification are mandatory during inventories. It should be confirmed that in the absence of an agreement to the contrary, such a mandate would apply only to DOI staff, not repository staff. In the absence of funding from DOI, such a mandate would be an unreasonable burden.

7. Input Form:

- a. In answer to the question “Does your institution hold any artifacts, scientific specimens, other objects, or associated records generated from projects or activities on DOI-administered lands?” the input form allows repositories to answer that they “likely [have] items from DOI-administered lands but...lack the expertise or resources to assess them.” To answer this question honestly - for example, based on the fact that staff time is fully committed – repositories will need some assurance that it will not lead to adverse consequences for their status as a repository. The same is true for any situation in which the repository answers “do not know.” Very seldom do repositories lack the necessary expertise, and the statement is adversely worded.
- b. The supporting documentation notes that, if no formal curation agreement is in place with the repository, the information from the input form “will enable 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.” It is not clear from documentation who will be responsible for defining what is “mutually agreeable,” or what will happen if the DOI and the repository are unable to reach an agreement. This is an important issue and must be clarified.
- c. The form asks whether a physical inventory of collections from DOI land has been completed. It needs to be made clear that if the answer is ‘no,’ and there is no agreement in place requiring that the repository perform the inventory, then the default responsibility lies with DOI.
- d. We note and welcome the statement by DOI that if the non-Federal repository does not have digitized accession and catalog records, DOI will use the estimates of record numbers to develop a project proposal and funding request to support this work at a future date.

8. Duplication of effort:

- a. In the supporting documentation, DOI states that the information request seeks new information about “DOI museum collections that DOI does not currently possess,” but it is unclear how this relates to information already collected by NPS, BLM and other bureaus. To avoid duplication of effort, this needs to be clearly explained on the input form.
- b. In the supporting documentation, DOI states that “any data collected by the bureaus has already been consolidated into ICMS and that information will not be requested again.” To ensure that this is the case, repositories need to be provided with a list of ICMS records for their institution prior to completing the input form.

9. Minimizing burden: we note DOI’s commitment to work in collaboration with the non-Federal repository to develop a work plan for DOI or DOI contract staff to gather any additional information that is needed. This is a positive step and is to be commended. In this regard, SPNHC encourages the investigation and use of existing GIS technologies and aggregators of collections data to facilitate the accumulation of data both by Federal and

non-Federal entities and thereby encourage the responsible publishing of collections data in line with standard protocols and best practices.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Bentley". The signature is stylized with a large initial "B" and a long, sweeping tail.

Andrew Bentley
SPNHC President
Biodiversity Institute
University of Kansas
Dyche Hall, 1345 Jayhawk Boulevard
Lawrence, KS 66045