

March 5, 2015

Office of Information and Regulatory Affairs
Office of Management and Budget
Attn: Department of the Interior Desk Officer
Sent via email to OIRA_Submissions@omb.eop.gov

Steven Floray
Office of Acquisition and Property Management
U.S. Department of the Interior
1849 C Street NW
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Washington, D.C. 20240
Sent via email to Steven_Floray@ios.doi.gov

Re: Proposed New Information Collection: Collecting, Documenting, Managing, and Preserving Department of the Interior Museum Collections Housed in Non-Federal Repositories (OMB Control Number 1084-XXXX)

The Natural Science Collections Alliance (NSC Alliance) appreciates the opportunity to comment on the Department of the Interior's (DOI) proposed new information collection related to DOI museum collections housed in non-federal repositories.

The NSC Alliance is a nonprofit association that supports natural science collections, their human resources, the institutions that house them, and their research activities for the benefit of science and society. Our member institutions are among the repositories for various federal collections that would be subject to the DOI proposed information collection.

Since the proposed new information collection was published in the Federal Register, natural science collections and scientists from across the country have contacted the NSC Alliance to express concerns with the proposal. Our institutions are dedicated to curating and protecting the billions of specimens and associated data they curate. Indeed, these specimens tell the scientific and cultural stories of our nation and the world. Importantly, many of the specimens held in our nation's natural science collections have been collected over centuries. Many were collected from sites that pre-date current geographic boundaries, as well as current Federal agencies such as the National Park Service.

The natural science collections community is a dedicated steward of our nation's natural and cultural heritage. As such, it recognizes the importance of maintaining good and useful data about the specimens contained in the collections. However, institutional representatives have expressed concerns with the proposed information collection. One concern expressed by many within the natural science collections community is that the request is overly burdensome and would require significant human and financial resources. The proposed information request is

also of concern as most Federal specimens are curated without any financial support from the DOI. Thus, this request would create a new financial obligation for many institutions. Moreover, it is unclear how the estimated annual time requirement of two hours and twenty minutes per respondent was calculated. Most in the collections community believe this to be low. There is also a concern that this request seems to have been developed without any consultation with the institutions from which the information is sought.

The NSC Alliance appreciates DOI's interest in understanding where its collections are maintained. However, there are too many unresolved issues and new burdens for the non-Federal collections community in the proposed request. For these and other reasons, the NSC Alliance urges that the DOI request be denied at this time. We would welcome an opportunity to engage with the Department of the Interior and the Office of Management and Budget in a productive and collaborative conversation to explore an efficient method of data delivery.

Thank you for considering our concerns. If we may be of assistance to you or the Department, please contact Robert Gropp, Ph.D., NSC Alliance Director of Public Policy at rgropp@aibs.org.

Sincerely,

Larry Page, Ph.D.
President
NSC Alliance