



# United States Department of the Interior

NATIONAL PARK SERVICE

SOUTHWEST REGION

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IN REPLY REFER TO:

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## Memorandum

To: Superintendents, Southwest Region; Chief, Division of Anthropology, SWR; Chief, Division of History, SWR; Chief, Division of Cultural Research, SWR; and Chief, Division of Special Programs, SWR

From: Regional Director, Southwest Region

Subject: Western Archeological and Conservation Center Collections Management Policy

Transmitted herewith is a copy of the recently completed Collections Management Policy for the Western Archeological and Conservation Center. This is an excellent statement of the policy needed to provide a professional level of care for archeological collections and may serve as a guide in the curation of your on-site collections as well as assist in your dealings with the Center.

The facilities of the Center are available to those areas in this Region that are within the anthropologically defined "Greater Southwest," i.e., Arizona, New Mexico, and West Texas. Areas further east, outside the semi-arid climatic zone, should not transfer any collections to the Center. As the Center is still organizing the collections on hand, materials should not be transferred there yet except in cases of extreme need.

It should be kept in mind that any park collections transferred to a central repository such as WACC must first be properly accessioned at the park so that each area is able to maintain permanent on-site records of where all of its museum collections, which are park resources, are located.

Enclosure

National Park Service

Western Archeological and Conservation Center

COLLECTIONS MANAGEMENT POLICY

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## MANAGEMENT RESPONSIBILITIES

### Western Archeological and Conservation Center

The basic curatorial management objective of the Western Archeological and Conservation Center (WACC), stated in its "Statement for Management" (1981:3), is to "Provide repository and conservation facilities for storage and care of NPS-owned anthropological collections pertaining to the arid Southwest." The details of how this is to be accomplished are contained in these collections management policies and the accompanying collections and conservation lab operations manuals.

The Center's "Role and Function Statement" (1982:2) specifies that the Center Chief's curatorial responsibility is "Providing facilities for professional storage, curation and conservation of NPS-owned anthropological and ethnographic collections (including artifacts, manuscripts, photographic images, maps, etc., which compose a set of archeological project data)". On the Center Chief rests the ultimate responsibility for all curatorial activities in the Center.

The non-curatorial personnel of the WACC are responsible for reading and conforming to curatorial policies and procedures as these have been distributed in the Center by the curatorial staff. The WACC Safety and Security Officer(s) is responsible for the Center-wide Safety and Security Plans, and should be responsive to collections' special needs as these do not infringe upon more important considerations. Curatorial staff are responsible for providing such input.

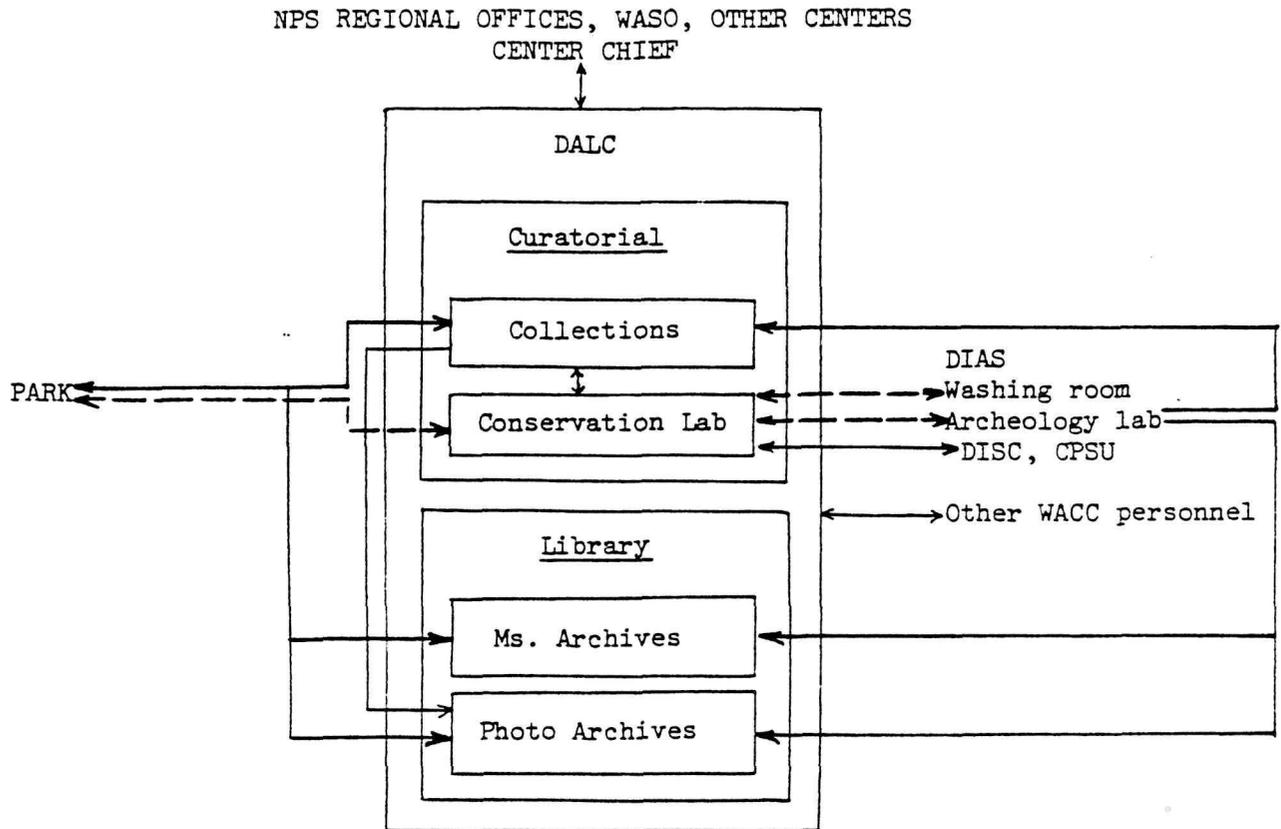
### Division of Anthropological and Library Collections: Curatorial Section

The curatorial portion of the Division of Anthropological and Library Collections (DALC) has first-line responsibility for professionally and properly taking care of the National Park Service (NPS) anthropological collections entrusted to the Center. "Professionally and properly" means according to current and professionally acceptable and recognized museum, conservation, and anthropological/archeological methods and principles. Obviously, this requires a staff with the appropriate education and experience. Key professional personnel are the Division Chief, the Curator of Collections, and the Conservator. Their specific responsibilities are detailed in their position descriptions and throughout these management policies and the collections and conservation lab operations manuals.

Within the scope of Center activities (see chart), curatorial staff are responsible for providing curatorial expertise as requested by other divisions. In part, this includes establishing policies and procedures that will meet the needs and standards of all concerned. Once these have been written and agreed upon, all staff members are obliged to follow them; curatorial staff are responsible for seeing that this is done. Anyone may offer revisions or additions.

Curatorial staff also respond to requests from NPS personnel outside the Center (see chart), providing such curatorial services as collections storage and care,

conservation work, exhibit specimens, comparative collections, and guidance/consultation on these and such additional topics as anthropological/archeological materials and methods as well as the detailed aspects of day-to-day collections curation and conservation. Curatorial staff also interact on a professional basis with non-NPS museum and archeological/anthropological colleagues and the general public, as put forth in these guidelines.



Flow of objects, services, and/or information between DALC/Curatorial and other NPS personnel.

## STANDARDS

### Curatorial Statement of Purpose

#### Responsibilities

From the Organic Act of 1916, the National Park Service derives an obligation to conserve "historic objects" in such a way as to leave them "unimpaired for the enjoyment of future generations." The Center contributes to this mission by providing the facilities and personnel to store, curate, and conserve NPS anthropological collections from the arid Southwest: this is a major component of WACC's "project support unit" function (WACC 1981, 1982; NPS 1980). Southwestern parks have been encouraged to take advantage of WACC's repository function for their systematic archeological collections and the staff is further available to assist parks with their curatorial concerns as requested (NPS 1978b; WACC 1982).

In addition to NPS management responsibilities, the curatorial personnel (along with other Center staff) must satisfy legislative mandates pertaining to the collection and curation of both archeological specimens and their documentation (36 CFR 66.3; NPS 1982). Further, curatorial standards and procedures must also coincide with the ethics of professional archeology. The goal of making archeological collections a viable research resource for present and future archeologists (Benfer 1977:413) depends upon this. The Curator has the responsibility "of insisting that the collections...be completely documented and organized so that they will be useful to future researchers. ...The museologist carries on the job of cultural resource management where the archaeologist leaves off." (Christenson 1979:162; also see Champe 1961.) To accomplish this, curatorial personnel must be grounded in both archeology and museology (NPS 1978b:9; Fitzhugh 1977:19). It is also necessary for them to work closely with the Center's archeologists, to serve their needs.

#### Adequate Curation

The three general categories of adequate curation of collections are accountability, security, and accessibility. The first covers all aspects of museum records keeping; the second, control of the "natural" and "human" environment--the "preserve and protect" requirement; and the third, the availability of material for research and interpretive needs. The entire composition of Center collections management policies and the operation manual--the Collection Preservation Guide (NPS 1981a, Ch. 3:12)--contain the "what" and the "how" details.

Many of the curatorial goals, policies, procedures, and standards that have been set forth for systematic archeological collections are the same kinds of precepts that would be required for any kind of museum collection, while more detailed specifications might also be applied to other types of systematic collections. However, what is collected is an archeological, not a curatorial,

decision; how the material is curated depends upon both archeological and curatorial principles.

Systematic archeological collections are "assemblages of materials that have been derived" "in a systematic scientific manner by trained archaeologists" from a

site of pre-historic [or] historic occupation. They...are part of an overall data retrieval system for deriving information of a scientific nature about past human behavior. Included within this sort of collection should also be excavation notes, site records and forms, photographs, soil samples, maps, drawings, measurements, artifact inventories, computer printouts, and any other information which is/could be part of the scientific inquiry process. Collections obtained in any sort of archeological project, e.g. surface surveys and intensive testing, are also systematic collections in the sense used here. A guiding principle should be that the collection resulting from any project should remain a systematic collection in order to preserve its potential for further research. (Anonymous 1978:1-2, 1980, Attachment II:2).

A Park Service Task Force on Archeological Standards (NPS 1982:3) has provided the following general guidelines for systematic archeological collections:

(1) Where possible all significant artifacts should be curated. Minimally those items essential to evaluating the relative importance of the resource should be curated. Significant artifacts, materials, data and records are those items which have provided or can be expected to provide information important to history and prehistory.

(2) ...the permanent repository for materials and data [should have] personnel to provide for long-term security, conservation, and access for appropriate scientific study and public enjoyment... [e.g., interpretation, exhibit].

And the Airlie House Report (McGimsey and Davis 1977:58) provided minimal elements of proper curation for such material. Summarizing several presentations on the curation of archeological collections (see references below) has resulted in the following list of relevant criteria:

Systematic retention of specimens and records

Establishment of current standards for objects and relevant supporting data to avoid acquiring poorly documented collections

Efficient system of museum records

Collections accessioned and cataloged

Specimens labeled

Collections inventoried

Past deficiencies brought up-to-date; records kept current

Adequate and long-term space for all collections

Environmentally controlled and monitored space

Adequate and proper packaging and storage

Adequate safety and security measures for specimens and records

Specimens sorted; cleaned as appropriate

Preventive maintenance; remedial conservation as necessary

Condition survey for conservation needs; collections monitored

Conservation facilities

Access for all qualified researchers

Systematic organization of specimens and records for maximum research potential ("data access")

Study space

Library and study collections

Loan program

Appropriately trained staff for collections and conservation

## Ethics

### Personal Collections

The goal of policies related to the ethics of acquisition is to prevent a conflict of interest, real or imagined, between the personal collecting habits of WACC employees (of any affiliation) and the Center itself. The primary concern is with items of material culture that coincide with collections stored at the Center.

Because the WACC has no acquisitions budget, there is no competition for collections that are for sale, unless the Center is asked to act on behalf of the NPS at large or for another NPS office. In the event of such an arrangement, WACC employees must not compete, in person or by any agent.

Furthermore, employees are enjoined from the following private ventures:

(1) Dealing in the types of materials encompassed by collections in storage at the Center, accepting business gifts and the like, if they have access to WACC collections;

(2) Diverting a potential gift, bequest, etc., to the Center or the NPS by an offer to purchase by self or agent (including family members); and

(3) Acquiring for one's personal collection items that are obtained contrary to existing Federal and state laws, or that are collected in an unethical and/or unprofessional manner (commonly known as "pothunted"), regardless of whether it is legal to so collect them.

Management reaction to violations of these restrictions may include one or more of the following:

- (1) Making the violation a matter of record in one's personnel file;
- (2) Same, including a reprimand; and/or
- (3) Effecting extant legal sanctions.

The regulatory underpinning for these legal and ethical considerations can be found in 43 CFR, Sec. 20, Chap. 735, Department of the Interior "Employee Responsibilities and Conduct," as well as in acquisition policy ("Regulatory Considerations").

#### Authentication-Identification

Curatorial staff may authenticate or identify objects for professional colleagues and other staff or for educational purposes for the general public, but not if the circumstances conflict with such legal and ethical considerations as are cited in "Acquisition."

#### Appraisals

No staff members shall participate in the appraisal of any specimen as a public service or in conjunction with a donation (Memo, "Donation policy," filing code F5415, (WR)AF January 29, 1980). Employees are also enjoined from appraising as a business on their own time. Curatorial staff may appraise NPS specimens for purposes of accountability or insurance.

#### Human Remains and Sacred Objects

Center management agrees with the American Association of Museums (AAM) Code of Ethics statement on this subject (AAM, Committee on Ethics 1978:15). Specific staff actions will be guided by Special Directive 78-1 (NPS 1978a), "Treatment of Archeological Properties, A Handbook" (Advisory Council on Historic Preservation 1980), and the draft NPS "Native American Relations Policy" (NPS 1981b), which include a detailed list of relevant legislation.

#### Professional

Curatorial employment is a public trust involving a measure of responsibility such that curatorial staff members must act with integrity and high professional principles; it is of importance that one's museum-related actions, on- or off-duty, not be negatively construed. Curatorial personnel should never abuse their official positions or their contacts within the museum community, impair

the performance of their official duties, compete with the NPS, or exploit the reputation of the Center or the NPS for personal or other advantage. (See AAM, Committee on Ethics 1978:17-18.)

The primary professional obligation of the curatorial staff is to assure that the collections (specimens and documentation) are cared for properly. It is the responsibility of the curatorial staff to implement the collections management policies and standards detailed here and in the Center's curatorial operations manuals.

Another ethical concern is to disseminate information to the public and other staff on antiquities laws, particularly as they pertain to collecting, and other pertinent legislation.

The judgement and recommendations of professional staff members regarding the collections must be given the utmost consideration by management. While management has the final decision and employees are expected to support these, "no staff member can be required to reverse, alter or suppress his professional judgement in order to conform to a management position" (AAM, Committee on Ethics 1978:23).

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## COLLECTIONS ACQUISITION AND DISPOSITION

The proper curation of artifacts is costly and space at the Center is finite. For these reasons, the WACC cannot accept everything and good judgement must be used in deciding what objects are most appropriately given the proper level of care that the Center's personnel and facilities provide. Further, the collection and subsequent manipulation of artifacts are intimately involved with Federal laws, regulations, and guidelines, as well as ethical and technical standards in the fields of archeology, anthropology, and museum management. It is with all of these considerations in mind that the following acquisition and disposition policies are directed. More specifically, the goals of these policies are:

- (1) To ensure that the curatorial staff acts in a legal, professional, and ethical manner in the acquisition and disposition of specimens.
- (2) To discourage illegal, unethical, and destructive actions toward cultural and natural resources.
- (3) To provide and maintain adequate documentation and records of collections.
- (4) To establish responsibility and authority in procedural matters.
- (5) To establish conditions of acceptability for all potential acquisitions and responsibility for all potential dispositions.

## ACQUISITION

### Acquisition Evaluation

The Center must be able to provide storage, protection, and preservation of the collections it houses under conditions that insure availability for study and exhibition. The Center cannot afford to curate permanently specimens that lack research, educational, or exhibit value. It is therefore necessary to establish conditions by which potential acquisitions may be evaluated for acceptability. Detailed considerations are set forth on the following pages, and all potential acquisitions shall be evaluated in terms of:

- (1) Relevance to and consistency with the purposes, priorities, and areas of interest (see "Scope of Collections" below) of the Center. Upon request from the regional curator or park superintendent, the Center may also act in the interest of a park in regard to proffered material that falls within the park's scope of collections (see "Types of Acquisitions," p. 13, and "Conditions of Acceptance," p. 17).
- (2) Research value: Professionally documented systematic collections shall be preferred, and field areas are enjoined to sent complete systematic

collections (see NPS 1981, Ch. 2, pp. 10-12). All material, regardless of whether it's from a systematic collection or not, should be documented in terms of origin, current and previous ownership, and use. Specimens with incomplete data, but with exhibit or limited scientific value may be acquired if it is reasonably certain that identification can be made through scholarly research. In the latter case, the cost of intake and holding should be considered in relation to the value of the material for these uses.

- (3) Ability of the Center to provide adequate storage and care.
- (4) Collection needs in terms of condition and duplication.

### Scope of Collections

#### Purpose

The statutory foundation for cultural resource management and preservation is outlined in the NPS "Management Policies Handbook" (NPS 1978a). The specific mandate for the Park Service to preserve objects is stated in the Organic Act of 1916 (P.L. 235; 39 Stat. 535), "...to conserve the scenery and the natural and historic objects and the wildlife therein..."; the Historic Sites Act of 1935, (P.L. 74292; 49 Stat. 666; 16 USC 461-467), which authorizes the Secretary of the Interior through the NPS to preserve and maintain objects of national historical or archeological significance and "establish and maintain museums in connection therewith"; the Museum Act of 1955 (69 Stat. 242; 16 USC, Section 18(f)), which authorizes the Secretary of the Interior through the NPS to acquire, exchange and loan museum objects; the National Historic Preservation Act of 1966 (P.L. 89665; 80 Stat. 915; 16 USC 470), which gives Federal agencies a leadership role in historic preservation (including the preservation of objects); Special Directive 78-1 (NPS 1978b: paragraph 4), which states that objects acquired in the course of professional research and which constitute an integral part of systematic, scientific collections, will remain part of those collections and be under NPS ownership and control; and EO 11593 (36 F.R. 8921) and the National Historic Preservation Act Amendments of 1980 (P.L. 96-515), which require Federal agencies to locate, inventory, and nominate to the Secretary of the Interior all objects under their jurisdiction or control that appear to qualify for the National Register.

The Manual for Museums (Lewis 1976), the "Cultural Resources Management Guideline" (NPS 1981), and the "Interpretation Guideline" (NPS 1976), among other sources, provide recommendations for collections management.

While there is no single policy statement that defines the scope of work of the Service's several archeological centers, the purposes of these centers as they are concerned with artifact collections are discernible in several studies, reports, and directives (e.g., NPS 1980, n.d.; National Park System Advisory Board 1979, 1980; Anonymous 1978, 1980). Basically, these relate to the management of archeological and anthropological collections, particularly those with research values. In particular, Special Directive 80-1 (NPS 1980) emphasizes the research potential of material stored in such centers and encourages their use as repositories for systematic, archeologically-derived and other anthropological collections.

The scope of the Center's concerns within this larger mission is confined to the archeology and anthropology of the Greater Southwest culture area (e.g., WACC 1979, 1981, n.d.; WRO 1980), and its facilities are available to the three Regions that overlap this zone. Upon request and in response to special needs, the Center will accept other cultural materials.

In sum, the WACC's collections management mission is focused on its role as a repository for NPS archeological and related anthropological collections of the entire American Southwest, with the primary interest on material with research value.

#### Description of Collections, Facilities, and Equipment

The material in storage at the Western Archeological and Conservation Center consists of collections from WACC, over 40 areas of the National Park System, and three Indian tribes. Specimens in the latter two categories have been sent for safe storage and curation because of a lack of adequate facilities, space, and/or trained personnel to manage them in the case of the former, and cooperative agreements in the case of the latter. The collections are primarily prehistoric and archeological, but also include a fair number of ethnographic and historic specimens. The vast majority of these items is from the American Southwest. Most of the material was derived from archeological work (mainly in the Anasazi area) and offers considerable opportunity for research. As an aid to such studies, there are also comparative collections of Southwestern type sherds, stone, shell, and faunal specimens; the latter (entirely skeletal remains) are housed at the Arizona State Museum at the University of Arizona, under a loan agreement. Most of the human skeletal remains are at Arizona State University, on a long-term loan arrangement.

The main storage area is a single, climate-controlled room of 21,417 sq. ft. In addition to stored collections, there is space for cataloging, for comparative collections, and for visiting scholars to work. A fire exit to the building's exterior and a set of double doors to an interior corridor are the primary means of access and egress. A third doorway leads to security storage, which has another entry to a building corridor. This room provides an additional 559 sq. ft. of storage space, and while it was designed to hold the more valuable specimens in the collection, another major criterion for storage here is the perishable nature of the items, as the facility has been equipped with a Halon 1301 fire suppressant system. Both rooms are classified as areas of restricted access.

It will be a matter of years before enough storage equipment and supplies have been obtained to contain the collections properly. In the meantime, the material will at least be situated on shelves in an organized manner. Additional shelving, NPS specimen cabinets, and staff are needed and are included in future plans.

The extant museum records are a mixed lot. The accession files are in good shape, but the catalog files are not. The classification copies (or Xeroxes thereof) of available cards are kept in security storage. A 10-254 is not available for each cataloged specimen housed at WACC and among those WACC does have are many for items not stored at the Center. Worse yet, thousands of specimens are not even cataloged.

During the course of shelving, a working inventory has been compiled. This gives a good idea of what is here and tells where to find it. A start has been made on a detailed, item-by-item inventory for input into the computerized collections management system, but only a limited amount of material has been coded at this time.

### Needs

As an archeological repository for the multi-regional Park Service areas in the American Southwest, the Center must be ready to accept for storage archeological and related anthropological collections that have research and/or exhibit potential. It may also acquire for its permanent collection, like artifacts from non-Service sources and specimens from related areas (such as northern Mexico), if they have research and/or interpretive value. For maximum research potential and convenience, archeological site collections should be stored in one place in their entirety. While there are legitimate reasons for splitting collections and sending parts to more than one institution (e.g., for exhibits and other park needs), the pros and cons of doing so should be carefully considered beforehand. Collections derived from WACC projects will be stored complete as acquired from the archeologist, and NPS field areas will be encouraged to send site collections that are as complete as possible.

Archeologists in the professional divisions at WACC and elsewhere should be responsive to the necessity of preparing type collections of sherds where these would augment the research value of the Comparative Sherd Library. In addition, it would be extremely useful to expand the comparative mineral and Gulf of California shell collections. Upgrading the entire collection to an even, high quality and making it conform to the Center's interests will require the disposal of non-Southwestern cultural material and undocumented Southwestern cultural material that has no research or exhibit value. Comparative material that has no bearing on the areas of interest will also be disposed of.

Management of what remains in storage must encompass accumulating as much information as possible for maximum research and interpretive potential. This requirement should pertain to the collections in hand as well as those accepted for storage in the future. When all of the collections have been inventoried, the next records chore will be to catch up on the cataloging. This means upgrading the catalog status as needed. As additional storage equipment and supplies are acquired, storage will be improved as necessary. As a result of a condition survey done during inventory, essential conservation treatments will be initiated.

### Types of Acquisitions

Provided that they meet the applicable conditions contained elsewhere in acquisitions policy, the WACC will accept materials derived from:

(1) Field collection. Whether archeological or ethnographic, these materials should be systematically collected and as fully documented as possible. They shall be made in compliance with the laws of the country,

state, or province in which the field work is done. (See WACC Operations Manual: "In-house Processing of WACC Field Collections: Tie-in with Curatorial.")

(2) Transfer. There are two types of transfer; both types make use of form DI-104 (see WACC Operations Manual: "Transfers"):

(a) Transfer of NPS collections to WACC for safe storage.

(b) Permanent transfer or exchange of property through NPS Clearinghouse or directly from a park.

Clearinghouse procedures are described in the NPS Manual for Museums (Lewis 1976: 135-136).

(3) Gift or bequest. The material must be the legal property of the donor or that person or institution must have legal authority to dispose of it. (See WACC Operations Manual: "Gifts.")

(4) Cooperative agreement. Usually a special type of long-term loan. For the present, this source covers materials derived from work for the BIA.

(5) Loans. These transactions are treated as a separate section of collections management policy (see "Museum Records," p. 27).

(6) Exchanges other than those negotiated between NPS facilities involve giving up one or more unneeded specimens in return for one or more of equivalent value that are needed (Lewis 1976:30-31). Strict equivalency of market value is not necessary, as the utility of the specimen(s) should be considered. However, the exchange is subject to audit. The Center Chief has the authority to make exchanges; is guided by the advice of the collections committee or the appropriate park superintendent and/or regional curator. (See WACC Operations Manual: "Exchanges.").

Materials received in the curatorial section which do not belong to the NPS and are not covered by a loan or cooperative agreement are temporary accessions (see WACC Operations Manual: "Loans"). These include:

(1) Items brought in for research, exhibit, photography, or technical use by the curatorial staff.

(2) Items brought in under contract or other agreement for analysis, identification, or preservation or other treatment by the curatorial staff.

(3) Items awaiting evaluation for acceptance as gifts, bequests, or exchanges.

The Center will not accept or hold the personal belongings of employees or others in its collections storage or conservation facilities.

The Center, having no acquisition budget, will not acquire specimens by purchase unless funds are transferred from another source for this specific purpose. A park superintendent, for example, may wish the Center to act in his interests for a specimen available locally.

Regulatory Considerations

The Western Archeological and Conservation Center will knowingly acquire only those specimens which staff has determined, to the best of its ability, to have been collected, exported, imported, transported, or otherwise obtained and possessed in full compliance with the laws and regulations of the country of origin, of the United States Federal Government, and of individual states within the U.S., and to have been collected ethically, responsibly, and in a manner compatible with professional archeological, and/or anthropological, and museum standards, as appropriate. Exceptions to such acquisitions will be such materials that it is directed to accept by virtue of its being a repository for an agency of the Federal Government, as in cases of confiscation by Government authorities, and old (pre-World War II) private collections, particularly those associated with Southwestern NPS field areas.

The Center will not support illicit trade by authenticating or commenting upon such material, or participate in transactions involving any collection of any museum or private person or institution that knowingly does so. Suspect materials will be reported at the appropriate supervisory levels. At the discretion of the Center Chief or the WRO-NPS, the appropriate law enforcement agencies will be notified. Alternatively, the licit quality of previously acquired items or potential acquisitions (including gifts and bequests) may be checked in the country or state of origin.

If the Center should inadvertently acquire an object that is later determined to have been collected, exported, imported, transported, or otherwise obtained in violation of this policy statement, the Center shall make every practicable effort to return the object to the proper owner, keeping in mind the necessity for preservation of the object. These policies shall be public knowledge.

International

The Center supports the UNESCO "Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property," particularly in light of the 1970 ICOM recommendations on Standards of Museum Acquisitions (ICOM 1970; Zelle 1972), the 1970 resolution of the Archaeological Institute of America (AIA 1971), the 1971 resolution of the Society for American Archaeology (SAA 1971), the 1972 resolution of the American Anthropological Association (AAA 1973), the 1973 Joint Professional Policy on Museum Acquisitions resolution of the American Association of Museums (AAM 1973), and the 1973 joint resolution of the ICOM Committee on Ethnography and the International Union of Anthropological and Ethnological Sciences (ICOM-IUAES 1973). Attention should also be drawn to the bilateral U.S.-Mexican treaty of March, 1971, for the recovery and return of Mexican Precolumbian art objects, artifacts, and Colonial religious artifacts and archives of outstanding importance.

Federal

Federal legislation and regulations that affect and/or effect the acquisition of the kinds of materials with which the Center deals include the following:

For cultural resources:

Antiquities Act of 1906 (P.L. 59-209), as amended  
Historic Sites Act of 1935 (P.L. 74-292)  
Reservoir Salvage Act of 1960 (P.L. 86-523)  
National Historic Preservation Act of 1966 (P.L. 89-665,  
amended by P.L. 91-423, P.L. 94-422, P.L. 94-458, P.L. 96-515)  
National Environmental Policy Act of 1969 (P.L. 91-190)  
Executive Order 11593, 1971 (36 F.R. 8921)  
Archeological and Historical Preservation Act of 1974 (P.L. 93-291)  
Executive Order 11988, 1977 (40 F.R. 6030)  
American Indian Religious Freedom Act of 1978 (P.L. 95-341)  
Archeological Resources Protection Act of 1969 (P.L. 96-95)

For natural resources:

Lacey Act of 1900 (16 U.S.C. 701-702; 31 Stat. 187, 32 Stat.  
285), as amended  
Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-711; 40 Stat.  
755), as amended  
Bald Eagle Protection Act of 1940 (16 U.S.C. 608-688d;  
54 Stat. 250), as amended  
Endangered Species Preservation Act of 1966 (P.L. 89-669), as  
amended  
Marine Mammal Protection Act of 1972 (16 U.S.C. 1361-1407; 86 Stat.  
1027), as amended  
Endangered Species Act of 1973 (P.L. 93-205), as amended  
Convention on International Trade in Endangered Species of  
Wild Fauna and Flora, 1975 (T.I.A.S. 8249)

NPS

The following regulations directly pertain to acquisition at the Center:

Organic Act of 1916 (P.L. 235; 39 Stat. 535)  
Museum Properties Management Act of 1955 (P.L. 127; 69 Stat. 242;  
16 U.S.C. 18)  
NPS-6, Interpretation Guideline (NPS 1976)  
NPS-28, Cultural Resources Management Guideline (NPS 1981)  
Special Directive 78-1, Policy Guidelines for Native American  
Cultural Resources Management (NPS 1978b)  
Special Directive 80-1, Storage of Museum Collections (NPS 1980)  
Management Policies Handbook, "Cultural Resources Management and  
Preservation" (NPS 1978a)  
NPS Donations Policy, derived from 41 Stat. 917; 16 U.S.C. 6, attached  
to cover memo F5415 (WR)AF, subject: Donation policy  
Reimbursement for Archeological Services provided the BIA, Temporary  
Policy and Guidelines, April 23, 1976

Documentation and Records

The significance of an object or a collection depends on its source being fully documented. As a matter of principle, no acquisition should be made without

this full documentation. However, undocumented specimens may be acquired for use in exhibits or comparative collections when relative essential documentation may be obtained through scholarly research after acquisition.

Systematic, professionally controlled and recorded archeological excavations and surveys should be documented by all pertinent field records and laboratory notes, as well as data required by the curatorial staff for the accession files. Original or copied field and laboratory data will be placed in the WACC archives as in-house archeological policy and procedure specify. Random specimens turned in at visitors' centers and other undocumented items will be accepted if there is a reasonable certainty they are from the park and they either have exhibit value or are of interest archeologically. WACC archeologists may be asked to examine such collections and confer with the Curator to make a recommendation as to whether they should be kept or disposed of. A similar procedure will be followed for any item that does not appear to fall within a park's scope of collections. Data on ethnographic material and nonsystematic archeological specimens should be as complete as possible for each object, in regard to collection, origin, use, history, and the like.

At minimum, accession and catalog records for all acquisitions will conform to the requirements of the NPS, as described in the Manual for Museums (Lewis 1976) and the NPS Museum Handbook (NPS 1962-1969). These records will be collected by the Curator and kept in the appropriate curatorial files. Beyond these sources, objects should be documented to standards that are normal for the appropriate scientific disciplines.

#### Conditions of Acceptance

The Center reserves the right to accept or reject materials on the basis of specified criteria that will be applied to potential acquisitions. Such routine considerations occur throughout these acquisition policies, viz, those pertaining to evaluative criteria, scope of collections, legal and regulatory considerations, professional ethics, and documentary standards. In addition, title to all objects accepted as donations or bequests must be transferred to the NPS free and clear, legal and valid, and such gifts should be without restrictions as to use or future disposition. In the event that any acquired object proves to have been illicitly obtained or otherwise dealt with, the Center is free to take action as described above (see "Regulatory Considerations," p. 15).

Occasions may arise where an offered collection contains both appropriate and inappropriate specimens. Particularly in cases where one or more objects is of outstanding scientific and/or artistic value, the collection may be accepted with the understanding on the part of the donor that no conditions attach to the transaction. Similar considerations will apply to single objects that are offered. On behalf of the NPS, the WACC may also accept donations that do not fall within its own scope of collections, but will be transferred for use in another area.

If an object or collection is unavoidably accepted with restrictions or limitations, the conditions should be stated clearly in the instrument of conveyance and kept as part of the permanent records of the accession.

However, every effort should be made to impose a reasonable time limit during which the limitation(s) shall apply and to define the conditions under which it shall terminate.

#### Responsibility and Authority of Personnel

The Division of Anthropological and Library Collections (DALC) curatorial section is responsible only for the documentation, care, and tracking of those objects or collections accessioned into its records. All other material brought into the Center is the responsibility of the Center Chief and the division or office which accepts such items for its own use. However, Center employees and contractors shall be in full compliance with the laws and regulations governing the transferral of ownership and movement of specimens across political boundaries. Furthermore, all employees are expected to discourage, by all practical means, unethical, illegal, and destructive practices with respect to collecting, transporting, and traffic in cultural and natural history materials.

The ultimate responsibility for appropriate decisions pertaining to acquisition and disposition is the Center Chief's. The Chief normally will rely upon the competence and the judgement of the professional staff, or other experts acceptable to them, in matters concerning the relevance and scientific usefulness of objects in the Center's collections and of specimens proposed for acquisition or disposition. A committee to advise the Center Chief on permanent acquisitions to and disposition of WACC's own collections will be appointed by the Center Chief in consultation with the Chief, DALC. This committee will meet as needed. It will be chaired by the Curator, DALC.

The primary responsibility for the advocacy and application of the standards herein set out lies with the Chief, DALC and the Curator, DALC, and all curatorial employees, in particular, are expected to be sensitive to them. The Chief, DALC has the responsibility of ascertaining that potential acquisitions are in compliance with the Center's standards.

It shall be the responsibility of the Division Chief and the Curator to establish standards of documentation for the collections and to detail accession and deaccession procedures relating to the collections. These guidelines shall be consonant with the policies herein stated. It shall be the Curator's responsibility to obtain and keep accurate records of specimens.

Donations to the NPS are tax-deductible for the value of the property as determined by a professional appraiser, receipt, or other valid documentation. It is not appropriate for Center employees to give appraisals for the purpose of establishing the tax-deductible value of donations offered to the Center. Procurement of an evaluation for this purpose will be the sole responsibility of the donor. Nor should Center employees appraise, identify, or otherwise authenticate for other persons, cultural or natural history objects or specimens under circumstances that could encourage or benefit illegal, unethical, or irresponsible traffic in such materials. Identification and authentication may, however, be given for professional or educational purposes. (Also see "Standards," pp. 6-8.)

## DISPOSITION

Disposition Evaluation

Disposing of objects or collections is an enterprise that may be contemplated in the interest of improving the collections or furthering the objectives, purposes, or scope of NPS activities. However, it is not something that should be accomplished without adequate consideration. From the viewpoint of the Western Archeological and Conservation Center, this is particularly so in the case of systematic archeological collections, whose research value rests on the integrity of the collection and associated documentation. In this regard, the WACC supports the motion on curation of archeological collections passed at the Regional Curators Meeting, Belmont Conference Center, November 1980. While portions of systematic archeological collections occasionally must be physically separated for appropriate and legitimate reasons (e.g., use in exhibits), a concerted effort must be made by all parties to return individual items to the project or site collection when this use has ended.

Potential dispositions, like potential acquisitions, should be evaluated on the basis of known criteria. It should be pointed out that classification of an item for deaccession does not mean that such material is without value, and specific ways of disposing of specimens appear in the section following this one. An object or collection may be disposed of on the basis of one or more of the following criteria:

(1) Relevance: consistency with the purposes, priorities, and areas of interest (see "Scope of Collections") of the Center or field area. Does the object lack scientific, historic, or interpretive value?

(2) Research value: Specimens that are poorly documented or undocumented will be considered prime material for disposal.

(3) Physical integrity: Is the material in such poor condition that it is of no use for anything? Is it beyond help as far as any conservation work is concerned or would the results not be worth the effort and cost? Conversely, the question of whether the Center can provide an appropriate environment and care for the preservation of any item should be examined.

(4) Authenticity: Material may lack authenticity and comparative value as well.

(5) Legality: If, on the basis of an adequate investigation, it is determined that an object or collection was acquired contrary to the Center's acquisition policy after its effective date, the Center is justified in returning the object to its rightful or legal owner, to the extent that it is legally possible and practical to do so.

(6) Destructive analysis: All or part of a specimen may be needed for destructive analysis for the purpose of archeological or other research whose potential result is judged to outweigh the value of the specimen.

(7) Redundancy: In the case of essentially redundant specimens or items of a quality inferior to other similar specimens in the collection, it may

be to the Center's or park's advantage to exchange one or more items for something judged to be more useful to present or future needs. Systematic archeological collections will be excluded from such considerations.

(8) Greater need elsewhere: There may be a real and legitimate need for an object elsewhere in the NPS that outweighs its retention at WACC, although in principle, systematic archeological collections ought to be excluded from such considerations.

#### Types of Disposal

Deaccession and permanent disposal of specimens is not in and of itself inherently wrong or illegal, but it is the way in which it is done that may come into question. Regardless which of the several mechanisms for disposing of an item is used, the potential act must be reviewed and recorded in a manner appropriate to the nature and value of the individual object.

The WACC has few options for disposing of material outside of the NPS: long-term loans to responsible institutions, exchanges, or allowable surplus property procedures. Acceptable means of disposal are as follows:

(1) Transfer of property to parks or other NPS office, using the DI-104. (See WACC Operations Manual: "Transfers.")

(2) Transfer to Harpers Ferry Center Clearinghouse. (See Clearinghouse Instructions.)

(3) Discard of specimens that lack scientific, historical, exhibit, or educational value. In the WACC and in park collections, this would normally be common, non-systematic archeological artifacts or fragments thereof that lack provenience data. (See WACC Operations Manual: "Discarding Material.")

(4) Destructive analysis for research purposes, as discussed in "Disposition Evaluation." (See WACC Operations Manual: "Destructive Analyses.")

(5) Exchange with responsible institutions. This alternative is more fully presented under "Types of Acquisitions." (Also see WACC Operations Manual: "Exchanges.")

(6) Long-term loan to responsible institutions. (See WACC Operations Manual: "Loans.")

#### Regulatory Considerations

The Museum Act of 1955 [P.L. 127; 69 Stat. 242; 16 U.S.C. 18(f)] does not provide the NPS the authority to dispose of objects outside of the Service by means other than "exchange" and "loan," and these provisions are restricted [also see cover memo D6215, (WR)OI, 31 July 1980, "Legal Authority to Exchange and Loan Museum Items," w/c encl.]. Any other mechanism for disposing of controlled property must be carried out according to appropriate property management procedures. These are contained in GSA regulations

(41 C.F.R. 101-43 through -46) and Department of Interior property management regulations (41 C.F.R. 114-43, -44, -45, and -60).

Needless to say, disposal must be done in good faith and with a reasonable assurance that the Center has the legal right to do so. Legal counsel will be sought if there are uncertainties in this regard.

### Ethics

Center management and curatorial personnel must be acutely aware of their role as custodians of public collections. This is especially important in regard to the disposition of material from the collections. In consideration of this circumstance, the fact as well as the manner of disposition shall be in the best interests of the Center, the NPS, the public trust, and the scholarly and scientific communities represented. Furthermore, all provisions for disposal shall be consistent with the legal and ethical constraints discussed in the preceding acquisition policies. Material that is the subject of current research or analysis will not be transferred until this use has ended.

### Documentation and Records

At minimum, deaccession records will conform to the requirements of the NPS, as described in the Manual for Museums (Lewis 1976) and the NPS Museum Handbook (NPS 1962-1969). These and any additional documentation considered necessary will be collected by the Curator and kept in the appropriate curatorial files. The pertinent regional curator will be notified of actions involving parks in the region.

### Responsibility and Authority of Personnel

Only the Center Chief has the authority to dispose of an object, and a Collections Committee is available for consultation (See "Acquisitions," "Responsibility and Authority of Personnel," p. 18). In this regard, no park collections will be disposed of without the written consent of the appropriate superintendent; a regional curator will also be consulted, as may a regional solicitor. At the prescribed point in disposal proceedings, controlled objects will be referred to the accountable property officer.

### References:

#### AAA

1973 Resolution of the American Anthropological Association on Illegal Trade in Antiquities. AAA Annual Report 1972, p. 60.

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1971 Resolution of the Archaeological Institute of America on the Plundering of Sites. Archaeology 24(2):165.
- ICOM  
1970 Ethics of Acquisition. International Congress of Museums. Paris.
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- Lewis, Ralph H.  
1976 Manual for Museums. National Park Service. Washington.
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- 1976 Interpretation Guideline, NPS-6. Photocopy.
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- 1978b Policy Guidelines for Native American Cultural Resources Management. Special Directive 78-1. File Code A5623(560). Photocopy.
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- n.d. A Study of Historic Preservation in the National Park Service. Management Consulting Division and Cultural Resource Management Division, Washington Office. Photocopy.
- National Park System Advisory Board  
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- SAA  
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- 1980 Operations Evaluation for WACC, July 25, 1980. File Code A6519, (WR)DOE. NPS. Photocopy.

Zelle, Ann

- 1972 ICOM Ethics of Acquisitions: A Report to the Profession. Museum News 50(8):31-33.

## ACCESS TO COLLECTIONS

It is the policy of the National Park Service that its cultural resources shall be available for educational and scholarly purposes. With even greater emphasis, the Service is charged to protect these resources for optimum preservation. In order to resolve these seemingly contradictory mandates, it is necessary to regulate access to the materials. The policies established for this purpose are based on standard, professional curatorial philosophy and practices acceptable in any museum context, but tailored to the needs of the Western Archeological and Conservation Center.

Since the primary responsibility is the physical integrity and safety of the collections, no one will be granted total access to the collections, excepting the curatorial staff in the course of its legitimate work. The Center Chief, Chief, Division of Anthropological and Library Collections, and WACC curatorial personnel shall have blanket access to collections storage areas, restricted only by rules for behavior in these rooms and guidelines for handling artifacts (see Operations Manual). Other individuals will be assisted or accompanied by a curatorial staff member, only excepting security and safety personnel during an emergency.

WACC access policy shall be a matter of public knowledge obtainable upon request to:

Curator  
Western Archeological and Conservation Center  
P. O. Box 41058  
Tucson, AZ 85717  
Tele: 629-6476 (FTS: 762-6896)

Unforeseen questions regarding access will be considered on a case-by-case basis by the Chief, DALC and/or the Curator. Application to the Chief, DALC or the Center Chief may be made for exceptions to any of the access policies. Justification for such exceptions must be included.

### Conditions of Access

No user fee will be made to anyone for access to collections or curatorial facilities. However, if the Center must expend funds to support a user, the user may be asked to reimburse the Center for this amount.

Normally, access will be during the regular working hours of, and according to the availability of, the curatorial staff. A request for access should be made to the Curator with as much advance notice as possible, with the understanding that the expectation of instant access may be met with disappointment due to previous commitments of staff time. In fairness to the curatorial staff, remember that it is more convenient for them to be able to plan their time ahead than to be interrupted in the middle of something. Work space will be provided for examination and photography of collections, limited by availability based on other current facility use.

Rules for behavior in storage areas (see WACC Operations Manual: "Access") will be observed by all who gain access. Unless an individual is present for the express and approved purpose of examining specimens, artifacts must not be touched. Student groups will be limited to junior high school or above.

Individuals requesting access to use collections will fill out a Request for Access to Collections form that will be used as the basis for granting or denying the request. WACC reserves the right to request a recommendation for individuals unknown to the staff by acquaintance or reputation. Access will be by advance appointment only and limited to legitimate scholarly and legal inquiry. The staff is under no obligation to facilitate random searches. Some collections may be set aside for active scholarly pursuits of staff members, but only for the duration of the research work. At tribal request, access will be denied to anything belonging to that tribe, under conditions set forth in writing by the tribal council or the designated representative(s). In lieu of written directives, access to tribally owned collections will be governed by the same policies as pertain to NPS collections.

WACC reserves the right to request copies of (1) notes taken on the collections and/or (2) resultant research papers or publications, providing this will not place an undue burden on the author and in relation to the importance of the collections to the report. In this regard, if WACC collections form a major part of the report, it is reasonable to expect a copy of that report for the library. Use of WACC-derived data will be acknowledged in any paper or published report, with specific mention made of the Western Archeological and Conservation Center, National Park Service.

#### Staff Responsibilities

The Curator shall have the authority to grant or deny access to collections storage areas and specimens for routine and/or short-term uses. The Chief, DALC shall have this authority for extensive and/or long-term usage. The Center Chief, and Chief, DALC have the privilege of granting access to anyone. The granting or denial of access must be predicated in the best interests of the collections or the NPS.

Requests for access to data other than those maintained by the curatorial staff must be made according to pertinent procedures (e.g., to Chief, Division of Internal Archeological Studies; Librarian).

#### Collections-related Data and Copying

All catalog, accession, and archival records that are the property of the NPS shall be treated as public information unless the data are excluded under the Freedom of Information Act, 81 Stat. 54, U.S.C. Para. 552(b)(4) and the Archeological Resources Protection Act of 1979, 93 Stat. 721, 16 U.S.C. 470, Sec. 9, or if they are covered by the revised Copyright Law, 90 Stat. 2541, 17 U.S.C. Otherwise, no restrictions shall be placed on them.

Pertinent policy pertaining to physical access to artifact collections will also apply to written material, whether original or copied. Xerox

charges will be made on the basis of the National Park Service, Western Regional Office, subject memo of September 10, 1979 (Fees for materials provided under the Freedom of Information Act). Artifact photography will be done with the user's own equipment.

## MUSEUM RECORDS

Broadly speaking, the two reasons that records are kept for museum specimens are accountability and the research-interpretive value. The minimal documentary level for NPS museum specimens has been prescribed in the Manual for Museums (Lewis 1976:142):

...a specimen has little or no value to a museum without accompanying information. For each object the essential facts are what it is, how and from whom it was acquired, when it was acquired and where it is. ...the more data associated with an object, the more useful it is likely to be.

A more detailed examination of each of these areas results in a complex of considerations, including management and staff responsibilities and accountability, data retrieval, procedures and documentary format of property transactions, automatic data processing, identifying labels, and inventory procedures.

### Types of Records

The following types of museum records shall be kept:

- (1) Accession/deaccession
- (2) Catalog
- (3) Transfer of property
- (4) Loan
- (5) Gift
- (6) Purchase
- (7) Receipt of property
- (8) Inventory
- (9) Miscellaneous (e.g., request for treatment forms, temporary deposit receipts, shipping documents)

These shall include official forms as well as supporting memoranda, letters, field or lab notes and charts, photographs, shipping papers, conservation records, etc., as appropriate, and/or the cross references to archival matter kept elsewhere (e.g., Conservation Lab, Library). They shall encompass temporary as well as permanent transactions and those that are in-house as well as external. Collections received from Indian lands will be accessioned for accountability, as will items sent from parks to the Conservation Lab. In

general, original materials will be kept in Collections files; any necessary copies will be sent to central files. Records shall be processed promptly as transactions occur.

The link between any and all of these records and individual specimens is one or more labels that accompany the specimens. Uncataloged material must also be labelled for identification. Eventually, most if not all of these specimens will be cataloged as well, so it is as necessary to be able to get back to records for these as it is for cataloged specimens.

In addition to the above, Collections files should include complete written records of all collections-related decisions. Collections-related statistics will be compiled on a monthly basis, summarized quarterly and annually. A monthly summary of Collections activities is strongly recommended, and environmental conditions will be recorded for purposes of monitoring.

### Inventory

The second stage inventory provides a general idea of the amount and kinds of material in each collection in storage and the locations of these materials. A detailed, item-by-item, third stage inventory is to be done. When this long-term project has been completed, a random sampling procedure for regular, periodic inventorying of the collections will be established. (The very general first stage inventory is obsolete.)

### Data Retrieval

Two of the functions of records are to enable one to identify and to locate objects. The first will be achieved by collecting as much information as possible on individual objects and collections at the time of acquisition; by researching objects thoroughly; and by describing them carefully and in detail. On a more practical level, photos are an aid in locating specific objects. Specific shelf, drawer, or other locations within the storage area must be recorded and kept up-to-date on extant inventory records.

In searching available records for certain kinds of data, the user will be greatly aided by consistent information--content as well as terminology. Descriptions of like things should contain the same kinds of information, always endeavoring to provide sufficient information to specifically identify each cataloged item or lot. Consistent terminology is particularly crucial for computerized data retrieval.

### Staff Responsibility and Authority

It shall be the Curator's responsibility to see that all required and supporting records are collected, filed properly, updated as necessary, and otherwise processed and accumulated. Staff will upgrade older documentation as opportunities arise from other projects or the research of others.

The senior Museum Aid will be responsible for inventorying specimens moving into or out of storage; compiling current quantitative data on storage space used;

updating second stage inventory records and catalog card locational data; and labelling specimens.

The Center Chief is WACC's representative for signing official forms.

#### LOANS

The Western Archeological and Conservation Center has the authority to loan specimens under the Museum Act of 1955, 16 U.S.C. 18(f). These transactions are restricted in that they must be (1) in the public interest, (2) without cost to the government, and (3) to responsible public or private organizations, institutions, or agencies [Cover memo D6215, (WR)OI, July 31, 1980, "Legal Authority to Exchange and Loan Museum Items"]. For the purpose of loans, "public museum" has been defined in a departmental memo (Department of the Interior, Office of the Solicitor, June 27, 1975, "Definition of a Public Museum").

#### External Loans

Any loan that involves moving a specimen outside of the Center or borrowing a specimen from outside the Center is an external loan. This includes any artifacts or other specimens borrowed or loaned by any WACC staff member, excluding architectural fabric that is not intended for disposition in collections storage. Considerations listed in the Center's acquisition and disposition policies may be applied to loan decisions.

#### Outgoing Loans

Loans can be made to other NPS units, established scientific and/or educational institutions, and others as approved, for the purposes of research, analysis, identification, or exhibit. Any of the following considerations may be taken into account when a loan request is being examined:

Data on environmental controls, theft history, security provisions of receiving facility

Likelihood that specimen(s) will withstand travel and intended use

Whether the requested specimen(s) is being used in-house; such objects will not be loaned without the researcher's approval

Any of the following conditions may complicate a loan agreement:

No sub-lending without written approval from WACC

Timely notification of damage

The borrower will not have authority to restore or treat without written approval from WACC

WACC reserves the right to withdraw objects from exhibit

Return packaging will be identical, equivalent, or superior to that sent out; the borrower may be required to pay for packing

Potential alterations to specimens must be approved in advance and specified or approved by WACC

The borrower may be required to provide wall-to-wall insurance coverage

The Western Archeological and Conservation Center, National Park Service, must be credited in publications, manuscripts, exhibit brochures, and/or reproductions of loaned material

Items of lesser intrinsic or research value may be loaned to non-NPS institutions on a long-term basis (see "Long-term Loans" below); more valuable specimens will be loaned and renewed on an annual basis. The collections owned by various Indian tribes will not be loaned outside the Center.

#### Incoming Loans

Specimens that may not withstand travel, extra handling, or the climatic change should not be borrowed. Borrowed objects will not be sub-loaned without appropriate documentation. The Center shall be liable for shipping costs in both directions (see WACC Operations Manual: "Loans").

#### Temporary Deposits

Temporary deposits are those objects left at the request of the owners for purposes of attribution, identification, study, potential gift, or the like. The general public is usually the source of such requests. No object should be accepted as a temporary deposit that does not meet requirements placed on all acquisitions. Such objects should be received only by those who are authorized to do so.

#### Long-term Loans

As far as the WACC is concerned, long-term loans include "indefinite" or "permanent" loans, whether outgoing or incoming. They will be made for research purposes or comparative collections and usually between the Center and well established institutions. Loaned material will almost always be of little intrinsic value. The minimal condition attached to outgoing long-term loans is that the specimen(s) be returned to the Center when the receiving institution is no longer willing or able to curate the material. Incoming long-term loans must conform to WACC acquisition policy.

Material destined for use in NPS areas may also be handled as a long-term loan (unless, of course, it is requested otherwise).

#### Internal Loans

Material borrowed from collections storage by permanent or temporary WACC staff for use in the Center constitutes an internal (or in-house) loan. Such

loans are generally for the purpose of research and study. A time limit, usually set by the borrower, is normally attached to in-house loans; they are subject to renewal. Material on in-house loan may not leave the building without the approval of the Chief, DALC. Any damage or loss of material on in-house loan will be reported to the Curator immediately. The borrower does not have authority to provide for the restoration or treatment of an object; potential or planned alterations of specimens must be approved and specified on the loan form. If specimens are borrowed for non-WACC publications or manuscripts, credit must be given to the Western Archeological and Conservation Center, National Park Service.

#### Staff Responsibility and Authority

The Division of Anthropological and Library Collections shall be responsible for all loans and temporary deposits of cultural material. The collections staff is responsible for following loan policy; for maintaining thorough documentation; for monitoring loans, returning, renewing, or recovering items promptly; and for packing and shipping. For incoming loans, the Center will hold the individual for whom material is borrowed responsible for compliance to the conditions placed on the loan and preserving and protecting the objects.

The Chief, DALC has authority to approve loan transactions and conditions. The Curator has responsibility for procedure and documentation; monitoring loans and temporary deposits; loan renewals; and packing and shipping. The Curator also has authority to make in-house loans. The Conservator will be available for examination of the condition of incoming and outgoing specimens, for monitoring the condition of borrowed material, for consultation on potential damage to outgoing collections, and for other needs as required. The Chief, DALC, the Curator, and the Conservator are authorized to receive temporary deposits for the Center.

Loans of NPS field project material to others may be arranged through DALC during the course of report writing. The terms and conditions covering such loans must be approved by the appropriate Division Chief or a member of the permanent professional staff.

The Center will not be responsible for incoming loans made to individuals (instead of the Center) or temporary deposits received by unauthorized personnel.

## PHYSICAL CONSIDERATIONS

The physical aspect of collections care is the foundation of preserving these resources. Along with documentation, it is one of the basic responsibilities of a curatorial program, and the fundamental principle must always be preventive maintenance. The potential threats to the physical integrity of the stored collections and their associated documentation are many and varied. Fortunately, many individual preventive measures relate to a number of threats and in combination provide a less complex deterrent than would otherwise be the case. But, since the best-laid plans are not always successful, a second or third line of defense must also be considered.

In addition, attention must also be given to physical considerations vis-a-vis the human element, both the curators (in the generic sense) and the users. It is the former, of course, who have the ultimate responsibility for the successful application of the policy and guidelines--the preservation of the collections' integrity for future generations.

### Collection Concerns

Environmental, or natural, threats provide a wide variety of potentially destructive elements for a large part of the collections stored at the Center, including the climatic conditions of temperature and relative humidity; other inherent features such as dirt, fumes, and light; and biotic activities of insects, fungus, and even rodents. The first category is relatively well controlled by the storage areas' heating, cooling, and humidifying systems. However, it is necessary to monitor and keep records of these systems by means of a series of hygrothermographs. Various filtering systems remove or decrease other pollutants and ultraviolet light rays, but must be supplemented by cleaning practices and/or protective storage procedures. Climate controls and monitoring are also essential to check the biotic elements, along with certain work habits and access rules peculiar to the collections storage areas. In addition, supplies and collections destined for these areas will be fumigated, and the storage areas themselves will be fumigated, both in accordance with current environmental and legal standards.

Disasters such as fire and earthquake are obvious major sources of potential damage to collections. The latter may be mitigated to some degree by protective storage devices, although the implementation of this alternative is currently limited by budgetary considerations. Fire damage, on the other hand, is being prevented or would be moderated by certain work habit requirements, special storage conditions for some materials, as well as a variety of fire suppression devices. Collections storage areas are included within the broader framework of Center safety and security policies and plans, which include regular building and equipment inspections by maintenance and city fire department personnel, and evacuation and other safety procedures supervised by the WACC Safety and Security Officer(s).

Damage or loss due to human frailties is a major source of concern. It may result from theft; usage, including careless handling and accidents; and such

storage practices as inadequate space and inappropriate storage modes. Civil disorder is an unlikely--but possible--threat at any Federal Government office; vandalism is more conceivable. As with disaster plans, the collections are subsumed in the broader Center plans of building security and safety. However, collections management policy requirements add preventive measures for storage areas, including limited and controlled access and curatorial staff clearances, responsibilities, and authority (see WACC Operations Manual: "Access to Collections"). Proper storage and usage of collections will be promoted by providing guidelines and training for staff and visitors, encompassing such aspects as proper ways of handling objects, packing and shipping, proper storage procedures and techniques, and other positive work habits.

The fourth and final category of damage relates to "inherent vice," those characteristics of certain materials that cause them to self-destruct. While some preventive actions can be taken by preparation for storage, environmental controls, and storage techniques, equipment, and/or supplies, the participation of the Conservator is particularly critical. All materials must be examined regularly as part of a cyclical maintenance program, and curatorial staff must continually be conscious of the necessity of checking the condition of specimens during the course of all work. It will be the responsibility of the Conservator, the Chief, DALC and/or the regional curator to decide on a course of treatment.

#### Human Concerns

The Center's responsibility is not strictly limited to the preservation of the collections in its care--there are human needs that also must be met. These relate to the people who care for the collections on a quotidian basis and to those who want to use them.

The safety of the staff is always a principle concern, in emergency situations as well as during the course of a normal work day. All employees are required to read the Center's safety plan and to comply with its provisions, as well as the further suggestions of the WACC Safety Officer. Building maintenance and regular inspection of fire suppression and other building systems is the charge of Center management, although curatorial staff has the responsibility of reporting unsafe or potentially harmful conditions and practices. Staff is also expected to practice certain work habits which may be exclusive to curatorial activities, meant to prevent accidents potentially harmful to both objects and staff. Exposure to toxic materials is regulated, if not prevented, by strict storage practices and the supervision of the fumigation room by the Conservator.

Accessibility of collections and data will be promoted by acquiring and holding intact systematic archeological collections and their documentation, by a system of storage for objects and records, by policy and guidelines for access to collections, and by setting aside study and work space.

#### Records and Supplies

Documentation of all kinds is critical for research and interpretive value and property accountability. Obviously, such records are susceptible to the same kinds of threats of destruction as are objects, and preventive and restorative measures also overlap, with one exception: records can and should be duplicated

to prevent their complete loss. Depending on fiscal resources, one or more technologies may be used, including photocopying, microfilming, photography, and computerization. Records must be preserved not only for their own content, but to cover losses of artifacts.

Supplies, too --boxes, trays, bags, envelopes, wrapping and cushioning material, labels, tape, etc.-- can also be more or less useful in preserving objects and records, and should be of an appropriate quality.

#### Staff Responsibility and Authority

The curatorial staff is responsible for work practices and procedures that promote the preservation of collections and records, according to NPS, WACC, and other museum standards and guidelines; personal safety of self and others according to Center policy and the further direction of the WACC Safety Officer; and the protection of collections and records, following standard NPS and museum curatorial procedures as they are applied at WACC, as well as other pertinent Center policy and the direction of the WACC Security Officer.

The Safety and Security Officer(s), in communication with the Chief, DALC and/or the Curator and Conservator, must be aware of and responsive to the special needs of the collections; is responsible for contacts with city fire and police departments and the FPS so these officers are familiar with WACC's collections storage situation and are prepared for an emergency.

Administrative personnel and the Safety and Security Officer(s) must communicate with the Chief, DALC, the Curator, and the Conservator as necessary, in regard to building maintenance, security, and safety procedures and activities as they may affect collections, as in the case of master key distribution and access to storage areas. All Center staff must abide by Center access to collections policy.

The Center Chief has the ultimate responsibility for preservation of collections and records. The Chief, DALC has responsibility and authority for pertinent policy and its application on a day-to-day basis.

PROCESSING OF IN-HOUSE WACC FIELD COLLECTIONS: TIE-IN WITH CURATORIAL

These assemblages represent systematic archeological collections and it is NPS curatorial policy to keep them intact (including artifacts, ecofacts, and documentation) except for loan, display, study, or security and fiscal control. (See the Minutes of the Regional Curators Meeting, Belmont Conference Center, November 21-23, 1980.)

It is to the benefit of contemporary and future researchers that in-house archeological collections receive adequate care and treatment, are properly labelled and processed for storage, and are thoroughly documented by the responsible archeologist. For this reason, Center and Division Chiefs have assigned refusal authority to the Curator: in-house archeological collections that are not properly processed and documented will not be accepted for storage. As a general policy, it is felt that all in-house archeological collections should be processed in the same manner--that is, including collections that will be deposited at a place other than WACC, unless that receiving office has alternative directions.

A four-page guideline has been made available to each Division; it can also be obtained from the DALC Curator.

GLOSSARY

access -- Physical entrance to the collections storage area for purposes of daily work; merely looking, as for an informal tour; examining specific collections, which may or may not include detailed study, analysis, and photographing; or maintenance.

accession -- An accession is all materials acquired from a single source at one time. To accession is to record such a temporary or permanent incoming transaction.

adequate -- Many of the conditions, actions, standards, and other requirements are herein specified for an "adequate" level or state. It should be understood that a more exact, detailed, and rigid definition cannot be presented. Such circumstances require decisions based upon professional, practical, and perhaps subjective factors which may change through time.

catalog -- A type of record pertaining to specimens that includes all significant facts about the object(s) associated with the accompanying catalog number. For museum specimens, this is the most detailed form of legal property accountability.

collections management policy -- A policy is "a definite course or method of action selected from among alternatives and in light of given conditions to guide and determine present and future decisions" (Webster's New Collegiate Dictionary 1975). More specifically, this refers to what the WACC will do to manage the collections in its repository facilities, as well as related matters. (Also see "Operations Manual.")

deaccession -- The permanent removal of one or more objects from WACC facilities, including the recording of this transaction. This does not necessarily refer to NPS stewardship.

dealing -- Buying/selling/trading artifacts for profit as distinguished from occasional sale or exchange from a personal collection.

disposal -- The permanent or long-term removal of objects from the WACC to another NPS unit, museum, or elsewhere according to legal, approved procedures.

in-house -- Within the WACC facilities or in regard to its employees.

legitimate -- "Conforming to recognized principles or accepted rules and standards" (Webster's New Collegiate Dictionary 1975). These may be based on legal, NPS-derived, museum and/or professional anthropological/archeological criteria.

operations manual -- These written guidelines describe how the WACC curates the collections in its care. They encompass the detailed procedures necessary to implement collections management policies.

professional -- "Characterized by or conforming to the technical or ethical standards of a profession" (Webster's New Collegiate Dictionary 1975). For curatorial staff, these standards are derived from the anthropological/archeological, museum, and conservation disciplines.

safe storage -- Since the record-keeping requirements of the NPS derive from non-museum property, they are not quite appropriate for museum specimens. As a repository for many parks, the WACC must handle permanent transfers of material--items a park or WACC does not want in its collection--as well as accepting material a park sends for storage and care. To distinguish the latter from the former, the descriptive phrase "For Safe Storage" is added to the transfer form in the second case.