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# CHAPTER 1: EVALUATING AND DOCUMENTING MUSEUM COLLECTIONS USE

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## A. Overview

National Park Service museums are responsible for properly preserving, managing, and providing access to their collections. NPS collections support, strengthen, and document the parks' cultural and natural history. To use collections effectively for interpretation, education, exhibition, and research, parks must provide both physical and intellectual access to collections.

Both preservation and use are fundamental to a successful NPS museum program. Collections are maintained because of their value to the park, NPS programs, and the general public. Neither preservation nor use are absolute values. Don't give one preference over the other. If you make informed decisions based on NPS policies and procedures, you'll be able to effectively manage and balance both preservation and use without significant compromises.

Park museum collections are an extraordinary resource. As a manager of park collections, you should make every effort to bring the tangible and intangible values embodied in these collections to the public.

### 1. *What is meant by access to collections?*

Good museum collections management makes collections accessible. Collections access can mean physical access to the museum facility and the collections or intellectual access to the available documentation and background data on the objects.

Providing access to museum collections supports your park's goals by:

- attracting scholars to research and write about your park's history as well as your cultural and natural resources
- encouraging publications, exhibitions, and similar works on your park or program
- developing a constituency of scholarly, international, heritage tourism and other public supporters of your collections who will speak for increased park resources for preservation and access
- helping you locate potential collaborators, cooperators, and partners in your work
- raising the profile of the park in the public's mind in a positive fashion

### 2. *How may museum collections be used?*

Collections may be used for:

- **publications:** journals, books, films, video, multimedia, and sound recordings
- **exhibitions:** furnished historic structures; museum, outdoor and in-situ

exhibits; visible storage; and media exhibits online or on CD-ROM

- **interpretation and education:** demonstrations and park, classroom, and long distance (via World Wide Web) education programs
- **research:** using both objects and documentation and material analysis
- **reproductions:** facsimile products; reproductions for sale; and preservation, deposit, and security copies (provided as alternatives to the original for use)
- **derivative works:** posters, T-shirts, postcards, reproductions, World Wide Web variants, games, toys, and coloring books

3. *What information does this chapter cover?*

In this chapter you will find information that will help you evaluate proposed uses of your collections and document access to the park's museum and archival collections. You will learn how to assess a request to use your park's museum collections.

A checklist to help you evaluate a request is provided. For a listing of NPS procedural guidelines that cover use of museum collections, see Section C, Management Issues.

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**B. Evaluating Proposed Use of Collections**

1. *Why do I need to evaluate requests to use museum collections ?*

When you receive a request to use the collections, you need to obtain specific information about the proposed use, what access is required, research methodology, and which objects or collections will be used. Often researchers won't know what specific materials are in the collection and can provide only generic information on their needs. Review researchers' requests to use the objects to ensure the proposed use won't violate any laws; or ethical, cultural, or scientific concerns; or any management requirements associated with the use.

2. *What should I do before researchers arrive?*

Examine the objects and determine whether they can be used without risk of destruction or damage. Evaluate whether the objects can be used without compromising their security. Determine if their proposed use conflicts with any federal or state laws. Determine if the use will promote visibility for collections and further the mission of the park.

3. *What restrictions govern the use of museum collections?*

All data, information and collections, except those restricted by law or in accordance with NPS policy, are available to all. Allow only controlled access to a park's museum collection. When you grant permission for access to a user, follow procedures for using the collection and the research space, based on the park's access and use policies. Supervise researchers continuously. Clearly define visitor hours and public areas. Restrict access to all areas that house collections. Security, locked doors, and escorts are essential in non-public areas. For a summary of laws governing access to collections refer to *MH-III*, Chapter 2, Legal Issues.

Access guidance based on management, ethics, cultural considerations, scientific concerns, preservation, protection, and documentation are discussed in this chapter

#### 4. *Who can use collections?*

Anyone can use NPS collections if the use conforms to NPS policies and guidelines. Users may include qualified NPS personnel, artists, contractors, historians, researchers, scientists, and the general public. Institutions and individuals may use park museum collections upon approval from the museum staff designated by the superintendent or center chief. Collections are open to researchers based on the park's written access and use procedures.

- Collections may be approved for non-commercial use:
  - when staff supervision is available, the requested collections are accessioned and cataloged, and the collections are appropriately stabilized
  - when individuals request access for research or study
  - when NPS staff, contractors, or cooperators on official NPS business request use of collections
  - when the NPS requests work (for example, conservation or reformatting) on an object

The object may be loaned to an individual (for example, a contractor) for that work. Otherwise outgoing loans of NPS museum collections are only made to institutions, in accordance with *Museum Handbook*, Part II (*MH-II*), Chapter 5, Outgoing Loans.

- Collections may be approved for non-commercial institutional use:
  - when parks loan collections to nonprofit educational, cultural, or scientific institutions (for example, museums, historical societies, and universities) for exhibition, long-term management, research, and/or photography
  - when representatives of Indian tribes, native Hawaiian organizations, or Alaskan corporations request access to archeological or ethnographic objects associated with their tribes
- Collections may be approved for commercial use:
  - when individuals or representatives of organizations, institutions, or corporations request collections or documentation for legitimate commercial or publicity purposes that are in keeping with park purposes and the NPS mission and don't conflict with legal restrictions such as copyright or privacy legislation or cause significant damage to the item (See Section C, Management Issues, for further guidance.)

5. *How does an interested party make a request to use the collections?* An interested party can make an appointment by phoning, writing, faxing, e-mailing, or visiting the park curator. See Section I, User Qualifications.
6. *How do I assess a request to use museum collections?* When you receive a request for access to collections, use the checklist in Section K and the Conditions for Access to Museum Collections in *Museum Handbook*, Part I (*MH-I*), Appendix G, Figure G.7, to help you evaluate the request. Evaluate requests based on the park's ability to provide access according to law and policy.
- You must consider all requests in an equitable manner, whether from staff, outside scholars, or the general public.
- All access requests should be:
- acknowledged
  - documented through the use of appropriate forms (See Section J, Documentation.)
  - treated with courtesy and respect
- Notify researchers promptly if their requests have been approved or not approved. Provide them with information on the park hours, address, parking, and other pertinent information.
7. *What issues do I consider when evaluating a request for use?* You must consider all of the following issues:
- legal
  - management
  - ethical
  - cultural
  - scientific
  - preservation and protection
  - interpretation
  - user qualifications
- Legal issues are addressed in *MH-III*, Chapter 2. The other issues are discussed in this chapter.

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## C. Management Issues

1. *Who evaluates a request to use museum* As the manager of the collections, you are delegated by the superintendent to evaluate all requests to use NPS museum collections. You must evaluate

collections?

all requests fairly and equally. Establish a museum collection committee to evaluate requests and assist in developing standard operating procedures for access and use, such as publication, duplication, and research requests. See *MH-I*, Appendix G, Protection of NPS Museum Collections, Figure G.7, and *MH-II*, Appendix D, Museum Archives and Manuscript Collections. All loans must be approved by the superintendent.

2. *What management concerns determine use?*

As a museum professional, you should encourage access to and use of collections and their data. You need to balance preservation and protection with providing physical and intellectual access to the collections. You must implement the requirements outlined by NPS policies and procedures, while adhering to professional museum standards, ethics, and the law. For additional information on museum and professional ethics, refer to Section D, Ethical Issues; for information on legal issues, see *MH-III*, Chapter 2, Legal Issues.

Consider the following when evaluating a request:

- Will the user be adequately supervised?

Make sure users will be continuously supervised. You or your staff should take the selected materials to the research room and monitor researchers while they work. You should have sufficient staff to provide the objects, monitor researchers, and respond to their needs. You also should document all materials used. ***Your access hours don't have to be extensive but must be continuously supervised.*** If staffing is an issue, limit access to certain predetermined times during work hours.

Well-supervised access reflects a well-managed collection. Refer to *MH-I*, Chapter 9, Museum Collections Security and Fire Protection, and Appendix G, Protection of NPS Museum Collections, and *MH-II*, Appendix D, Museum Archives and Manuscript Collections.

- Will users have sufficient space?

Assign a research room for users to view and study museum objects. The room should be outside the collections storage area. See *MH-III*, Appendix D, Guidance on Planning for a Research Space, and *MH-I*, Appendix F, NPS Museum Collections Management, which direct museum storage to be separate from all other uses.

A research room also can be an appropriate shared space outside storage where the user can work. It should be a room close to the curatorial staff workspace. This proximity allows you to supervise users easily and answer their questions.

You might use the park library reading room if no other space is available. Refer to *MH-III*, Appendix D, for additional information on using research spaces.

***Never leave a researcher unmonitored in areas with collection materials.***

- Are the materials accessioned and cataloged?

All collections should be accessioned and cataloged prior to use. This way you can track what collections are used and ensure greater accountability and security. If you allow access to and use of unaccessioned and uncataloged collections, you are exposing them to great risk, as you can't prove they are NPS property if they are stolen or damaged. You must make every effort, in accordance with *MH-II*, Chapter 2, Accessioning, and Chapter 3, Cataloging, to accession and catalog collections to make them available for use. Accession and catalog data also provide context, collection provenance or history, object provenience, and research information that are extremely valuable to the user. A catalog record greatly helps the user's research.

- Are the materials too fragile to use?

Collections use should be compatible with preservation objectives. If the object is so fragile that handling it will cause irreparable damage, provide the requestor with an image (photographic or digital) of the object, or a facsimile of the item, plus accompanying information. You should have a collection conservation survey done, and prioritize and address collections conservation and stabilization needs. Refer to Section G of this chapter. You also should have high quality photographs of the most used and fragile objects in the collection.

- Does the proposed borrower's facility meet NPS outgoing loan standards?

If the object will be used away from the museum collections storage, research room, work area, or from the park itself, you must generate an NPS outgoing loan agreement. The user (borrower) must meet all the conditions noted in the agreement. The user is responsible for treating collections carefully to maximize their future usefulness.

The borrowing institution must meet the standards outlined in the *Revised Standard Facility Report* published by the American Association of Museums. See Section G of this chapter and refer to *MH-II*, Chapter 5, Outgoing Loans, Section C, Documenting Loans, for additional information on the facilities report.

- Are there any legal restrictions on the item?

See *MH-III*, Chapter 2, Legal Issues.

3. *What NPS procedural guidelines cover using museum collections?*

NPS *MH-I* contains preservation and protection and *MH-II* contains documentation guidance to effectively use NPS museum collections. The *Conserve O Gram (COG)* series provides additional topical and timely information on preventive conservation for NPS museum collections.

- What NPS management policies and guidelines do I need to know?

Become familiar with the sections related to managing museum collections in the NPS policies and guidelines listed below.

- NPS Management Policies (1988)

This document contains policies that provide direction and set the parameters for management decisions in administrating the National Park Service. The following chapters deal with museum collections:

Chapter 4: Natural Resource Management, covering Natural Resource Collections

Chapter 5: Cultural Resource Management, Museum Objects and Library Materials, covering Treatment of Museum Objects; Acquisition, Management, and Disposition of Museum Objects; Historic Furnishings; Archives and Manuscripts; and Library Materials

- Director's Orders

Director's Orders outline the policies, instructions, and requirements imposed on the NPS at the Director's discretion. They don't restate policies and requirements imposed on the NPS by law, the President, the Secretary, or any other entity. The Director's Orders may, however, affirm that the NPS will comply with those policies and requirements.

- NPS Management Guidelines

NPS management guidelines outline the policies and procedures for many programs. The following pertinent NPS guidelines contain policies and procedures directly related to managing museum collections. They allow us to identify, preserve, protect, and document museum collections for present and future uses:

NPS Cultural Resource Management Guideline  
(formerly NPS-28)

NPS Natural Resources Management Guideline  
(formerly NPS-77)

NPS Personal Property Management Guideline  
(formerly NPS-44)

NPS Records Management Guideline (in prep.)  
(formerly NPS-19)

NPS Special Park Uses Guideline  
(formerly NPS-53)

NPS Interpretation and Visitor Services Guideline  
(formerly NPS-6)

You should be familiar with the *Departmental Manual* Part 411, Policies and Standards for Managing Museum Collections. This document outlines policies, responsibilities, actions, and standards for managing museum property in Department of the Interior bureaus. Refer to *MH-I*, Appendix A, Mandates and Standards, Section B, Departmental Policies and Standards for further information.

- Are the items entered into ANCS?

Make sure all museum collections that will be used have been accessioned and cataloged into the Automated National Catalog System (ANCS) prior to use. This includes objects loaned to off-site repositories. By entering information into ANCS and its successor, ANCS+, you readily can record and track information related to museum collection use.

- What are associated data and how may they be used?

Associated data refer to related information on a specific object or group of objects. Associated data include but are not limited to source of accession information, collection provenance or history (object provenience), and legal documentation of the collection. The catalog record contains extensive data categories that capture information on the object. Additional related data, such as annotations and research findings, are filed in the accession or catalog folder. Field notes, in particular, contain important and associated collection data.

These data are critical to the full understanding and appreciation of the object. Without these data, the research value of the object is diminished greatly. Know the various laws restricting access to museum collection data. Refer to *MH-III*, Chapter 2, Legal Issues, and to Question 4 below.

4. *What data do I need to restrict?*

*MH-III*, Chapter 2, Legal Issues, fully outlines the laws that deal with information on museum collections. Don't give out the following data:

- site location and the nature of archeological resources in accordance with the Archeological Resources Protection Act (ARPA) of 1979
- information protected by privacy and publicity law such as images or words of living private individuals (See *MH-III*, Chapter 2, Legal Issues.)
- location, character, and ownership information on historic resources, including cultural or religious sites, paleontological specimens, geological specimens, and culturally affiliated resources if the disclosure might invade privacy, impede the use of a traditional religious site by a practitioner, or endanger the historic resource according to the National Historic Preservation Act Amendment of 1980 (16 USC 470 w-3) (See *MH-III*, Chapter 2, Legal Issues, for guidance.)

Also restrict the following types of data:

- location information on nesting sites or other specific habitat information on threatened and endangered species consistent with the purpose of the Endangered Species Act (16 USC 1531 et seq.) and NPS Management Policies
- museum collection storage location and appraisal and insurance values, if the release may place collections at risk
- donor and lender addresses, the release of which may infringe on individuals' privacy

Names may be restricted to the fullest extent allowed by law if the donor or lender requests it. Place a notation in the accession folder, describing the donor or lender's privacy request at the time of the accession.

Such information may be considered releasable under the Freedom of Information Act (FOIA) on a case-by-case basis. If you receive a FOIA request, alert your superintendent and immediately contact and work with the FOIA officer to develop a response. Also talk to other affected NPS professionals such as the chief of resources (natural and cultural), Support Office (SO) curator and regional public relations officer. See Section F, Scientific Issues, and *MH-III*, Chapter 2, Legal Issues.

5. *What do I need to know about consumptive use?*

Consumptive use (destructive analysis or sampling) destroys or alters all or part of an object or specimen. It is an acceptable use of certain items in NPS museum collections. *Cultural Resource Management Guideline*, Chapter 9, Section 4, Consumptive Use of Collections states:

*(c) Destructive analysis is a legitimate use of museum collections for approved research purposes when the impact is minor or when the object is common, in which case approval by the superintendent is required. If an object is rare or significant, a request for destructive analysis must be reviewed by the SO curator and approved by the regional director . . . .*

***Consumptive use of type specimens is not allowed.***

Cultural Resource Management Guideline, Chapter 9, further states:

- (e) *The regional director will grant no exemption for use that might lead to loss or deterioration of museum objects that are directly connected with or prime survivors from the park's historic periods, events, or personalities; or are type specimens or one-of-a-kind natural history specimens; or are from systematic archeological collections, have known archeological site provenience, or have scientific value that has not been extracted and documented; or remain of scientific interest. The justification statement must certify that the objects requested for exemption do not meet the above criteria. If this certification cannot be provided, an exemption may be granted only by the director . . . .*
- (f) *No exemption will be granted for use of museum objects where such use may lead to loss or destruction of human remains, associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act, unless such use is approved by the affiliated cultural group in addition to the regional director or director . . . .*
- (g) *An exemption may be granted for scientific analysis . . . of any museum object, except natural history type specimens, if that analysis is based on a professional research design that clearly documents the scientific need for the use of such techniques . . . .*

For specific information on how to obtain permission for consumptive use of collections, including threatened and endangered species, see *Cultural Resource Management Guideline*, Chapter 9, Section 4, Consumptive Use of Collections. The *Guideline* specifies that the regional archeologist or equivalent must be involved in the review of all proposals for destructive analysis of rare or significant archeological objects or materials. For additional information on threatened and endangered species, see Section F.

Many research uses involve destructive sampling. However, because of developing technologies that allow more powerful and non-invasive analysis, you should use caution when “using up” scarce objects or specimens for destructive analysis. The Guidelines for the Care of Natural History Collections published by the Society for the Preservation of Natural History Collections in *Collection Forum* 10, no. 1, p. 32-40 (1994) state:

***Balance between use and preservation:*** *Associated with the responsibility of ongoing use and education use is obligation of the institution to maximize the value of each specimen for future use. This applies not only to the data associated with each specimen, but also to the physical and chemical integrity of the specimen. Thus, it is critical that the demands placed on natural history specimens for current research and education uses are balanced with the need for preservation of the specimens for future use.*

Consider the following criteria outlined in *Guidelines for Institutional Policies and Planning Natural History Collections* published by the Association of Systematics Collections, 1994, when you evaluate a written request to do destructive analysis:

- *The intended use must have scientific merit.*
- *The researcher must demonstrate competence with the proposed methods . . . .*
- *The proposed methods must be the least intrusive for obtaining the intended results, and must be likely to yield the intended results.*
- *The researcher must have sufficient resources to carry out the method.*
- *There must be sufficient material available to support the destructive sampling without sacrificing all the available material of the particular collecting event (lot or herbarium sheet) . . . .*
- *The researcher must be able to stipulate that (s)he has used all relevant specimens/objects available at the home institution first.*
- *The potential for compromising future utility of the specimen or object for other investigation should be minimized.*
- *The researcher should intend to disseminate results of the work within a reasonable amount of time.*
- *The researcher should be willing to abide by the institution's operational standards for processing and documentation.*
- *The researcher must indicate the quantity of material necessary for his/her research . . . .*
- *Failure of an individual to comply with institutional requirements and standards in previous transactions may be grounds for denying any new requests . . . .*

The researcher should:

- pay for all associated costs
- document the procedure used
- return all unused portions of objects or specimens unless otherwise agreed to in writing
- provide the park with a copy of the resulting analytical data and duplicates of tangible products such as slides within a stipulated time period

6. *What do I need to know about the chain of custody?*

Chain of custody is a legal term used when law enforcement issues or matters of evidence are at stake. Objects, specimens, archives, or personal papers that are collected or impounded for use in a court case as evidence may be subject to a chain of custody.

You must house these objects separately with tightly controlled security and limit access to authorized users. Everyone, including the curator and law enforcement officer(s), who views or handles the objects must log whenever these objects are accessed or used. As the person authorized to hold this material, you must be present whenever this material is viewed or handled by anyone. Nothing may be removed or rearranged. The chain of custody ensures that you can document everyone who had access to the evidence while it was in your custody. Your documentation must be able to withstand scrutiny in a court of law.

7. *What do I need to know about hazardous materials and chemical contamination?*

You should determine what parts of the collections may pose a problem; for example, mercury- or arsenic-treated specimens, radioactive minerals, asbestos-plaster mounts, or moldy, insect- or pest-contaminated records. Older collections especially are vulnerable and have a higher incidence of contamination from chemicals used to prepare, preserve, and protect specimens. Determine what problems may arise from materials used to treat or prepare collections historically, such as arsenic, mercuric chloride, DDT; vaporizing compounds with residues such as naphthalene or paradichlorobenzene; or wet collection fluids such as formaldehyde or alcohol. Review all collection documentation, annotation labels, and preparation notes to determine which chemicals were used to prepare collections. Research manuals and procedures that state past practices. Check the specimens for traces of chemical contamination.

***Handling some objects and biological, geological, and paleontological specimens in the museum can present health risks. Be aware of potential hazards and, if appropriate, monitor for chemical agents.***

If you suspect chemicals have been used, call in a specialist or test them yourself. Refer to *MH-I*, Chapter 11 and Appendix H, Curatorial Health and Safety, and the nine *Conserve O Grams* 2/1-9 on security, fire and curatorial safety. Record all chemicals used to prepare or treat specimens on the catalog record and the accession and catalog folders.

Inform users about objects that may have been treated or contaminated. If possible, have the object decontaminated when you receive a use request. Consult your park safety officer, a conservator, and the SO curator.

When NAGPRA items are repatriated, notify the recipients of any hazards associated with the items, such as arsenic or residual chemicals from fumigation.

8. *How do I establish and implement a park access and use policy?*
- Establish an access policy that covers the park purpose, times of operation, and general access procedures. Refer to *MH-I*, Figure G.5. Sample Park Museum Collection Access Policy and Procedures, for general museum collections, *MH-II*, Figure D.13, Access Policies and Rules Governing Use (Sample), for archival collections, and this chapter. You can adopt these sample policies as they are, or adapt them to your park's needs. The policy should be available to users of the collections. See Section C, Question 1, on establishing a working group to develop a park access and use policy.

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## D. Ethical Issues

1. *What ethical issues affect access and use of NPS museum collections?*
- Ethical issues affecting museum collections use include equal access for all researchers; civility and cooperation with colleagues and the general public; scholarly integrity; respect for confidential and private information; and a professional commitment to preservation.

In general, NPS staff must perform their responsibilities as described in the *Museum Handbook*, Parts I and II, Appendix A, Mandates and Standards; *MH-I*, Appendix D, Code of Ethics for Curators, Archivists, and Conservators; and in the ethical statements of the American Association of Museums (AAM), the American Association for State and Local History (AASLH), and the Society of American Archivists (SAA). The questions below further define appropriate conduct for NPS museum curators and archivists.

2. *What is equal access and how do I provide it?*
- Equal access is a fundamental principle. However, museum and archival and manuscript collections have two very different access and use traditions. See Section I, User Qualifications.
- ***For museum objects***, equal access means treating all researchers the same, whether they are NPS staff members or outside researchers. If you require an evaluation process before authorizing use of collections, you must apply this requirement to all individuals conducting personal research, including staff.

The International Council of Museums (ICOM) Code of Professional Ethics states:

*It is the responsibility of the museum to use the collections for the creation and dissemination of new knowledge through research, educational work, permanent displays, temporary exhibitions and other special activities...the museum should seek to ensure that information in displays and exhibitions is honest and objective and does not perpetuate myths or stereotypes . . . .*

*Members of the museum profession should deal with the public efficiently and courteously at all times and should in particular deal promptly with all correspondence and enquiries. Subject to the requirements of confidentiality in a particular case, they should share their expertise . . . allowing bona fide researchers properly controlled but, so far as possible, full access to any material or documentation in their care even when this is the subject of personal research or a special field of interest.*

The AAM 1994 *Code of Ethics for Museums* states:

*The museum ensures that . . . access to the collections and regulated information is [sic] permitted and regulated . . .*

All policies and procedures (such as user evaluations) must be implemented equally for staff, visitors, and scholars. For a fuller view of how museum access and use policies have developed differently from archival access and use policies, see Section I, User Qualifications.

- ***For museum archival and manuscript collections***, equal access means providing access to all without review processes or credential evaluations. All taxpayers and visitors have a right to use federally held records and archival collections for research, according to FOIA and state Sunshine (state equivalent of FOIA) laws.

The American Library Association-Society of American Archivists' (ALA-SAA) *Joint Statement on Access to Original Research Materials, in Libraries, Archives, and Manuscript Repositories* states:

*It is the responsibility of a library, archives, or manuscript repository to make available original research materials in its possession on equal terms of access . . . A repository should not deny access to materials to any person or persons, nor grant privileged or exclusive use of materials to any person or persons, nor conceal the existence of any body of material from any researcher, unless required to do so by law, donor, or purchase stipulation.*

The American Historical Association (AHA) *Statement on Standards of Professional Conduct* states:

*Since historians must have access to sources—archival and other—in order to produce reliable history, they have a professional obligation to preserve sources and advocate free, open, equal and nondiscriminatory access to them, and to avoid actions which might prejudice future access.*

You need policies, procedures, appropriate forms, and staff training in monitoring access and providing reference services before granting access. If you are determining procedures and restrictions as the research occurs, you are failing to meet NPS standards.

If you don't have enough staff to handle walk-in researchers (all collections use must be continuously supervised), your access policies may require an appointment. Your policy may not state that only scholars or staff may use the materials, nor may you restrict permanently your archival and manuscript collections without a legal basis. Not having a reference staff is an unacceptable excuse for long-term restrictions. You must learn how to handle reference work or train staff to do it.

FOIA requests may require you to provide access to collections previously designated as restricted by the donor. These restrictions must be honored to the extent allowed by law. It's NPS policy not to accept restricted donations. See *MH-II*, Chapter 2, Accessioning, Figure 2. When such restrictions conflict with a FOIA request, consult with your FOIA officer, the NPS solicitor, and the SO curator.

Once federal archival and manuscript collections are made available to one, they are available to **all** (with the exception of materials exempted by law or preservation condition). See *MH-III*, Chapter 2, Legal Issues, for further guidance on FOIA and other legal issues. For a sample access policy and rules governing use, see *MH-II*, Appendix D, Museum Archives and Manuscript Collections, Figures D.13a-b.

- ***For equal access to both museum and archival collections***, establish clear and fair written policies and procedures. Apply your standard operating procedure for handling research and duplication requests equitably, whether the requests come by phone, fax, e-mail, or in person. Restrictions must apply equally to staff, visitors, students, scholars, and others. Staff are not allowed to research within restricted collections. Restrictions can be applied only to the extent allowed by law. For example, FOIA may legally require access to some materials that donors or staff have restricted for legal, ethical, or cultural reasons. Work with your superintendent, FOIA officer, and the NPS solicitor to resolve conflicts between restrictions and legal access requirements.

3. *What are ethical standards of civility and professional cooperation?*

Professional behavior forms a crucial part of this ethical responsibility for equitable access. The ICOM Code of Professional Ethics states,

*Members of the museum profession have an obligation . . . to share their knowledge and experience with their colleagues and with scholars and students in relevant fields. They should show their appreciation and respect to those from whom they have learned and should present without thought of personal gain such advancements in techniques and experience that may be of benefit to others . . . .*

- ***Courteous treatment of researchers:*** All researchers must be made welcome and treated courteously and equitably. NPS policy requires that museum staff serve the public in a professional and courteous manner, regardless of personal inclinations or other duties. NPS staff also are expected to work cooperatively with colleagues.

NPS collections are supported by taxpayer dollars; therefore, it is our responsibility to make these collections available to those for whom we hold them in trust. FOIA and state Sunshine laws provide external mechanisms for enforcing such access.

*NPS should respond promptly to all reference requests for museum object and archival and manuscript collections, generally within 20 working days.*

NPS researcher registration procedures provide an internal process for providing equal access. See *MH-II*, Appendix D, Museum Archives and Manuscript Collections, Sections T and U, for guidance.

- **Collegial Civility:** NPS staff also have a professional responsibility to:
  - treat their colleagues civilly and with consideration
  - respect diverse viewpoints
  - resolve disagreements without rancor
  - seek common ground for fruitful collaborations

The ICOM Code of Professional Ethics states:

*Members of the profession form working relationships in the course of their duties with numerous other people, both professional and otherwise, within and outside the museum in which they are employed. They are expected to conduct these relationships with courtesy and fair-mindedness and to render their professional services to others efficiently and at a high standard.*

When disagreements occur, as they do in all communities, both parties are responsible for working together to reach common ground. If personalities become an issue, return the focus to actual performance and behavior. Work together to resolve difficulties.

The American Historical Association (AHA) 1992 Statement on Standards of Professional Conduct states:

*. . . the preeminent value of all intellectual communities is reasoned discourse—the continuous colloquy among historians of diverse points of view . . .*

- **Professional Cooperative Responsibilities:** NPS museum staff are encouraged to work in partnership with other museums, libraries, archives, universities, and associations within their state and region to ensure the best preservation, protection, management, and access to NPS museum collections and data.

Staff are encouraged to develop cooperative preservation, descriptive, and access and use strategies to maximize resources and researcher access. For cooperative archival documentation strategies, refer to *MH-II*, Appendix D, Section Q, Questions 11-16. These strategies might include:

- cooperative development work to fund cataloging, preservation and use activities
- shared World Wide Web sites with area museums, archives, and libraries featuring online exhibitions, finding aids, virtual tours, and similar access systems
- cross-referenced and linked Web sites
- shared funding development campaigns with regional repositories, cooperating associations, the National Park Foundation, and other sources to enhance access
- shared published thematic catalogs or shared guides to multiple repository collections (union guides) in a region
- collaborative exhibits and exhibit catalogs using collections from several museums that can be sent to each museum involved
- collaborative research and analysis on collections in more than one museum

Forming partnerships with related organizations enhances the quantity and quality of work completed, giving the general public better access to collections. Additionally, sharing information on museum and archival procedures, techniques, and methods improves the professionalism of all involved. The NPS supports cooperative work with other federal, state, and local organizations and institutions to help meet preservation and access goals for parks and programs.

4. *What is scholarly integrity and what role does it play in providing access to collections?*

Scholarly integrity refers to the high standard of scholarly accuracy, balanced viewpoint, and lack of conflicts of interest that scholars are expected to achieve in their work. Scholarly integrity applies to NPS staff, including museum staff.

- ***NPS staff use of collections for personal research:*** You may use collections for personal research on your own time, as long as this research is:
  - supervised continuously by a professional
  - made known to your immediate supervisor
  - made known to other scholars using the same materials

You may not use restricted collections for *personal* research if those collections are not equally available to all researchers. However, you may use them for management purposes as needed. Avoid using NPS collections in a manner that may be judged a conflict of interest. Potential conflicts should be discussed with the NPS ethics officer.

- **NPS staff publications:** Staff should adhere to high standards of research, writing, editing, exhibitions, cultural consultation, and interpretation. Staff must:
  - be aware of changes in research resources, methodologies, and techniques by taking appropriate courses, learning from partners, reading widely, and consulting reviews of the published record
  - avoid factual inaccuracies by checking reputable sources carefully
  - avoid infringing copyright, privacy, and publicity laws and triggering lawsuits by obtaining necessary permissions and licenses
  - not plagiarize, but properly acknowledge others whose work has been used
  - keep informed of publications and exhibitions technologies and techniques in order to choose appropriate technologies for a message
  - conscientiously cite captions and credit lines as requested by creators and repositories holding original materials
  - avoid stereotypes and assumptions by reading widely both historical and current scholarship
  - obtain peer review from a range of qualified scholars and traditionally associated groups
- **NPS museum staff personal collecting:** See *MH-I*, Chapter 1, NPS Museums and Collections, Section F, 4b.2, Personal Collecting.
- **Avoidance of Conflicts of Interest:** NPS staff are expected to avoid situations that present a conflict of interest between their professional and private lives. See *MH-I*, Chapter 1, Section F, and *Ethics: An Employee Guide* (U.S. Department of the Interior, 1998). If you are uncertain if a situation poses a serious conflict, contact your supervisor, the NPS Ethics Officer, and your SO curator.

5. *How do privacy, confidentiality, and related restrictions affect my conduct?*

A variety of privacy and confidentiality issues affect how NPS staff grant access to and use of NPS collections, including those listed below:

- **Privacy of donor and lender negotiations:** Museums and archives have a professional responsibility to respect donors' and lenders' privacy by not divulging information on donor and lender negotiations or contacts. Honor this restriction to the fullest extent allowed by the law. This information might include:

- security arrangements of private or NPS collections
- quality and nature of materials brought into the museum for identification
- addresses of donors, lenders, or potential donors or lenders.

**Note:** Names may be restricted to the fullest extent allowed by law if the donor or lender requests it.

When uncertain of the extent of privacy protection, contact the NPS solicitor and your SO curator. The solicitor may determine that you can restrict this information based upon the National Historic Preservation Act Amendments of 1980. FOIA requests for donor negotiation information must be dealt with according to FOIA policy. See *MH-III*, Chapter 2, Section E, Question 1, and Section F, Question 11.

- ***Privacy of employee personnel, medical, and psychiatric records:*** Don't accession this material into the museum collection; it should be maintained in the park's records management system. If the records are official records, they belong in the National Archives not in the NPS museum collections. If they aren't official records, they are protected by privacy legislation during the lifetime of the individuals documented. See *MH-III*, Chapter 2, Section D, Question 4.
- ***Privacy of research:*** Both museum and archival researchers, whether NPS staff or outside users, must complete registration and duplication request forms according to NPS policy. See Section J, Documentation. These forms are required to:
  - maintain use documentation
  - help plan future acquisitions strategies
  - plan for publications
  - enhance replevin (legal return of illegally removed collections through the courts)
  - discourage theft
  - document parties who may be responsible for collections damage, vandalism, or theft

Although NPS staff collect and maintain these forms for administrative purposes, NPS curators and archivists support the privacy of researcher registration and duplication data to the extent allowed by law.

Treat researcher registration, circulation, and duplication data as if it were both privileged and private (restricted). In general, don't tell researchers:

- what topic other scholars or students are working on
- what is being used as research materials
- what is being duplicated

The only exceptions to this guidance are:

- When possible, notify researchers of similar research by other individuals using the same materials, to save both researchers from conflicts later. Obtain permission from both parties before such notification.
  - Once permission is obtained, parks may share this information for management purposes, such as for Government Performance Results Act (GPRA).
- ***Privacy and confidentiality issues relating to the collection's content:*** Both federal and state law protect the privacy of living, private individuals, while publicity laws in almost half of the states protect celebrities and their estates from unapproved commercial uses of their images. Other specific legislation described in *MH-III*, Chapter 2, protects location information for certain types of materials.

The ICOM Code of Professional Ethics states:

*There is a special responsibility to respect the personal confidences contained in oral history or other personal material. Investigators using recording devices such as cameras or tape recorders or the techniques of oral interviewing should take special care to protect their data and persons investigated, photographed, or interviewed should have the right to remain anonymous if they so choose.*

*This right should be respected where it has been specifically promised. Where there is no clear understanding to the contrary, the primary responsibility of the investigator is to ensure that no information is revealed that might harm the informant or his or her community.*

***Museum staff and their families must not personally profit from, or publish data or information obtained, while working with restricted collections. Restricted access means no one, including staff, has access for personal research.***

- ***Sensitivity to cultural issues:*** Cultural issues may pose powerful ethical challenges for many NPS museum staff. For guidance see Section E, Cultural Issues; *MH-III*, Chapter 2, Legal Issues; and *Cultural Resource Management Guideline*.

- **Donor and lender access and use restrictions:** While the expressed restrictions of collection donors and lenders don't override federal legislation, such as FOIA provisions or subpoenas (see *MH-III*, Chapter 2, Legal Issues), NPS staff should honor donor and lender restrictions to the fullest extent allowed by law. See *MH-II*, Chapter 2, Accessions. It may be necessary to talk with the NPS solicitor on how to best meet donor and lender requirements without conflicting with equal access or FOIA provisions.

6. *What role should preservation play in NPS ethical values?*

The ICOM Code of Professional Ethics states:

*Subject to the primary duty of the museum to preserve unimpaired for the future the significant material that comprises the museum collections, it is the responsibility of the museum to use the collections for the creation and dissemination of new knowledge . . .*

- **Preservation of the museum collections:** Use of collections should not cause significant and irreversible damage to the collections. The exception is destructive analysis, which is a legitimate use of museum collections for approved research purposes when the effect is minor or the object is common. See *Cultural Resource Management Guideline*, Chapter 9, Management of Museum Objects. While all exposure to light, handling, and duplication causes some damage, this is a natural part of the inevitable self-destruction of all organic materials. NPS staff will attempt to mitigate this damage to the greatest extent by following the guidance in *MH-I*, and in Section G, Preservation and Protection Issues, below.
- **Preservation of the informational context of museum objects:** Much of an object's value resides in the information we have about it, including its creator, collector, provenance or history, provenience, cultural and historical context, and topical identifiers, such as:
  - collection provenience for archeology
  - phylum, class, order, family, genus, and species for biological, and paleontological specimens
  - artist, style, medium, technique, iconography, and period for art or historical works
  - creator, dates, provenance, physical description, subject matter, arrangement, restrictions, and historical background for an archival or manuscript collection

It is equally essential, for legal reasons, to document any:

- special permissions or authorizations for use
- releases (model releases or interviewee releases)
- site licenses

These legal authorizations allow copyright or privacy and publicity-protected materials to be used in publications, exhibitions, and other special uses, including the Internet, such as the World Wide Web. You are responsible for accurately maintaining this information and documentation.

Take care to accurately and sensitively reflect the object or document creator's perspective and the cultural context without the addition of errors or unsubstantiated personal opinions.

Museum staff must be:

- eager to serve their audiences with useful and accurate materials
- able to safeguard the accuracy and currency of the data they have on museum collections
- knowledgeable about how to conduct research in a professional manner
- willing to share their work for peer and associated community review and commentary prior to publication
- able to accept editing, fact-checking, and correction
- willing to share their sources, data, and evidence in case of a challenge to the publication or exhibition text
- responsible for monitoring to ensure the object's cultural context is accurately and sensitively reflected in products of researchers, in NPS publications and in other uses of the collections

***When researching and interpreting museum materials during cataloging, exhibitions, publications, and reference work, avoid inserting stereotypes, assumptions, and unsubstantiated personal opinions into the accessioning, cataloging, description, and reference. All personal opinions and observations should be identified and documented as such.***

Museum staff are responsible for enhancing this contextual information through accurate and scholarly research that follows the best practices of the profession. Every attempt should be made to capture substantiated expert knowledge held by donors, scholars, and associated groups for the museum documentation, particularly the catalog record and archival finding aids. Research of NPS museum collections must not endanger this informational context.

Databases, finding aids and other descriptive systems (including automated systems) must be designed and managed to make it impossible for researchers to change data or to access legally restricted data, such as archeological site location information. See *MH-III*, Chapter 2, Legal Issues.

<b>Responsibilities of Museum Staff</b>	
<b>To whom are you responsible?</b>	<b>What must you do?</b>
<b>The General Public</b>	<ul style="list-style-type: none"> <li>• Provide equal access to all non-restricted collections to the extent allowed by law and consistent with NPS policy.</li> <li>• Protect private and confidential information to the fullest extent allowed by law.</li> <li>• Ensure the security of the museum collection. <ul style="list-style-type: none"> <li>– Don't provide access to unaccessioned and uncataloged collections.</li> <li>– Don't provide access without supervision.</li> <li>– Don't provide access to originals of high-value or fragile materials.</li> <li>– Deny access to collections to researchers who have been known to steal from or damage collections.</li> </ul> </li> <li>• Preserve integrity, accuracy, and completeness of the information context (documentation) of museum objects.</li> <li>• Preserve the museum collection physically. <ul style="list-style-type: none"> <li>– Teach researchers how to handle items.</li> <li>– Provide photographs or duplicates for research when materials are fragile.</li> <li>– Maintain proper surveillance of researchers.</li> <li>– Ensure the research room environment doesn't endanger items.</li> </ul> </li> <li>• Record expert knowledge of donors, scholars, and associated groups and add it to the museum documentation as appropriate.</li> </ul>
<b>Your Employer (the NPS)</b>  <b>Your Employer (cont.)</b>	<ul style="list-style-type: none"> <li>• Avoid all conflicts of interest and appearance of such, in the subject area of the collections including: <ul style="list-style-type: none"> <li>– personal research in restricted collections</li> <li>– personal publication or distribution of restricted information</li> <li>– competitive employment or businesses</li> <li>– appraisal of objects outside NPS</li> <li>– receipt of personal gifts</li> <li>– development or research on personal collections</li> <li>– removal of research materials and documentation created during the scope of employment</li> </ul> </li> <li>• Follow the letter and the spirit of NPS and DOI policies and procedures.</li> <li>• Work in a fully professional fashion following the guidelines provided by professional associations (AAM, SAA, and AASLH).</li> </ul>
<b>Yourself and Other Employees</b>	<ul style="list-style-type: none"> <li>• Ensure your staff knows and uses NPS museum management ethics policy and legal guidelines. See <i>MH-III</i>, Chapter 2, Legal Issues, and <i>MH-I</i>, Appendix D, Code of Ethics for Curators, Archivists, and Conservators.</li> <li>• Monitor staff compliance.</li> <li>• Ensure staff use of museum collections is equitable, made known to supervisors and other scholars using the same material.</li> <li>• Determine that NPS staff don't conduct personal research in restricted collections, or publish or distribute restricted information. Staff must not get privileged access.</li> </ul>

<b>Responsibilities of Museum Staff</b>	
<b>To whom are you responsible?</b>	<b>What must you do?</b>
	<ul style="list-style-type: none"> <li>• Ensure NPS staff are informed they can't become dealers or receive gifts from dealers.</li> </ul>
<b>Our Donors and Lenders</b>	<ul style="list-style-type: none"> <li>• Ensure the privacy of donor and lender negotiation information to the extent allowed by law, unless or until written permission is received to share this information.</li> <li>• Follow existing access and use restrictions to the fullest extent allowed by law.</li> <li>• Capture the donor's knowledge about the donated materials.</li> <li>• Obtain from the donor all copyrights, model and interview release forms, and related permissions so that NPS can use the collection fully.</li> </ul>
<b>Creators and Their Heirs</b>	<ul style="list-style-type: none"> <li>• Obtain from all creators or their heirs all copyrights, model and interview release forms, and related permissions so that NPS can fully use the collections.</li> <li>• Give full credit to the creator in all credit lines and citations.</li> <li>• Respect creator restrictions to the fullest extent allowed by law.</li> </ul>
<p><b>Those peoples and groups whose collections NPS holds, or who appear as subject matter of NPS collections</b></p> <ul style="list-style-type: none"> <li>– Affected groups</li> <li>– Ethnic groups</li> <li>– Native Americans</li> <li>– Native Hawaiians</li> </ul> <p><b>Peoples and Groups (cont)</b></p> <ul style="list-style-type: none"> <li>– Private individuals</li> <li>– Religious groups</li> </ul>	<ul style="list-style-type: none"> <li>• Follow legal and policy guidelines on access and use.</li> <li>• Ensure collections are treated with respect and empathy for associated groups.</li> <li>• Investigate and document potential collection sensitivity issues when collections are acquired and <i>before</i> providing access.</li> <li>• Be aware of laws that affect access to these materials. See <i>MH-III</i>, Chapter 2, Legal Issues.</li> <li>• Consult with the associated groups <i>before</i> making decisions that may affect the group, such as acquisition of or access to sacred or otherwise sensitive materials.</li> <li>• Provide access to federal records as required by NPS policy and state and federal laws.</li> </ul>
<p><b>Your Users</b></p> <ul style="list-style-type: none"> <li>– Collaborators</li> <li>– News reporters</li> <li>– Park staff</li> <li>– Publishers</li> <li>– The public</li> <li>– Scholars</li> <li>– Students</li> <li>– Writers</li> </ul>	<ul style="list-style-type: none"> <li>• Provide equal access to all, regardless of whether they are staff, students, scholars, reporters, or public visitors.</li> <li>• Keep researcher registration and duplication data confidential to the fullest extent allowed by law. Only share this data with the researcher's permission.</li> <li>• Provide courteous, knowledgeable, and accurate reference service.</li> <li>• Maintain user documentation including copyright and privacy statements, researcher registration, and duplication forms.</li> <li>• Thoroughly document and maintain files on any permissions given or received to publish or use materials (including site licenses, publication permissions, copyright receipts) for exhibits, Internet sites, and publications.</li> </ul>

<b>Responsibilities of Museum Staff</b>	
<b>To whom are you responsible?</b>	<b>What must you do?</b>
<p><b>Your Professional Colleagues</b></p> <ul style="list-style-type: none"> <li>- Archeologists</li> <li>- Architects</li> <li>- Archivists</li> <li>- Biologists</li> <li>- Conservators</li> <li>- Curators</li> <li>- Geologists</li> <li>- Historians</li> <li>- Landscape Architects</li> <li>- Librarians</li> <li>- Paleontologists</li> <li>- Registrars</li> </ul>	<ul style="list-style-type: none"> <li>• Follow the professional ethics statements of archivists, curators, registrars, and related disciplines.</li> <li>• Provide to all high-quality reference and access service to collection records, consistent with NPS policy and state and federal laws.</li> <li>• Work with cooperative or collaborative partners, such as other museums, archives, educational programs, and libraries to: <ul style="list-style-type: none"> <li>- create shared Web sites</li> <li>- publish union guides</li> <li>- develop travelling exhibitions and catalogs</li> </ul> </li> <li>• Share information on NPS-developed access and use strategies at professional meetings</li> </ul>

7. *What do I need to know about employee ethics?*

As a federal employee, you are expected to maintain high standards of honesty, integrity, impartiality, and conduct. These standards ensure the proper performance of government business and the continuing confidence of the people of the United States. As a federal employee, you're expected to serve the public responsibly and maintain the public trust. See *MH-I*, Chapter 1.

If you are offered monies for a work created during your normal scope of work as a NPS employee, consult your park Ethics Officer to determine if the park may transfer the money to the cooperating association or

equivalent approved donation accounts for use by the park. You must not personally accept a check or other payment for work completed on NPS time.

8. *What do I need to know about professional ethics?*

Most professional organizations publish ethics statements. See the Codes of Ethics for professions related to museum work in *MH-I*, Appendix D.

## E. Cultural Issues

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This section addresses some of the cultural concerns that affect use of cultural and natural collections. You should identify the associated groups that have an interest in the park collections, how they were made, created, and are stored, used, or made accessible. Work with the associated groups to identify their concerns and to honor those concerns to the fullest extent allowed under the law and NPS policies. Many groups have valid concerns about how their cultural heritage material is used. You need to understand and deal sensitively with these issues. Management Policies (5:10) states that interested persons will be permitted to inspect and study NPS museum objects and records in accordance with standards for preservation and use of collections and subject to the policies regarding confidentiality of resource data.

Where possible, consult with the associated groups before acquiring potentially sensitive museum collections. Keep in mind that access to NPS museum collections means balancing the interests of many traditionally associated groups—including makers, creators, scholars, and subjects—and those yet to come, whether of the culture represented or outside it. Consult with the SO curator, discipline specialists, your park FOIA officer, the NPS solicitor, and the NPS Ethics Office staff as necessary.

### 1. *What cultural concerns affect use?*

The western notion of intellectual property, copyright, and privacy is being widely discussed. Certain groups have proposed that indigenous peoples have special and collective rights to all aspects of their culture, whether expressed tangibly or not. Such an approach would protect ideas as well as recorded, filmed, painted, sculpted, choreographed, and written expressions of ideas. These proposals run counter to U.S. copyright legislation, which protects only tangible expressions for a limited time.

You should be aware of this debate, but remember you are obliged to follow the law (see *MH-III*, Chapter 2, Legal Issues), implement NPS policies and procedures, and act in accordance with professional standards and ethics. The concerns of some indigenous cultures need to be balanced against the:

- First Amendment rights to freedom of speech, allowing American citizens to write and speak about anything not expressly forbidden by law
- FOIA and related state Sunshine laws, which make information held by public institutions available to the public, unless a particular statutory restriction prohibits access
- lack of a mechanism for limiting access retroactively to information. Once information has been available to one researcher, FOIA requires that other researchers wishing to use the material in federal repositories have equal access
- existing copyright and privacy laws

2. *How do I identify the concerned parties?*

Work with your park or regional ethnographer to determine who the traditionally associated groups (the groups that may be affected by the use of the object) are by identifying the:

- creator of the object(s)
  - artist
  - collector
  - craftsperson
  - photographer
  - researcher
  - writer
- heirs and descendants of the original creator (who may still hold intellectual property rights, such as copyrights)
- donor(s)
  - may be the same or different from the creator or the creator's heirs
  - a collector who purchased or traded for object(s)
- descendants of the donor or former owners
  - may still hold some intellectual property rights, such as copyrights
- communities; tribes; social, ethnic, and occupational groups, whose identity is connected to the:
  - objects(s)
  - symbol(s) on the objects
  - non-symbolic representation(s) on the objects
  - associated rituals
  - associated stories or other legacy information
- archeologists, ethnographers, and others who may have excavated, collected, researched, or worked with the materials
- the general public as taxpayers, researchers, and potential users

An item may be associated with more than one group. Each associated group may have a set of cultural rules and meanings, each of which should be taken into consideration where possible.

3. *How does NAGPRA affect collections access and use?*

In accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (25 USC 3001-3013), NPS is required to consult with all associated or affiliated tribes and lineal descendants regarding the treatment and potential repatriation of those NPS museum collections defined as NAGPRA-eligible. Refer to *Cultural Resource Management Guideline, Appendix R, NAGPRA Compliance* and *MH-II*, Chapter 6, Deaccessioning, for additional information. Consult your SO curator concerning storage and handling procedures of NAGPRA-eligible collections.

NAGPRA doesn't provide a legal basis to restrict access and use of NAGPRA-eligible museum collections documentation or archives. NAGPRA doesn't call for the repatriation of archival and manuscript materials. Documentation of objects being repatriated via NAGPRA may be obtained by FOIA requests, even though the records may be sensitive. Traditionally associated groups should be informed that sensitive NAGPRA documentation cannot be withheld if a FOIA request for it is received. If you receive a FOIA request for NAGPRA documentation, consult with your superintendent, FOIA officer, NPS solicitor and SO curator as explained in *MH-III*, Chapter 2, Legal Issues.

Consider the effect on the traditionally associated groups if the information you collect and maintain is publicly available. You can't change the legal requirement to make information publicly accessible, but you can control what you collect. Collect and keep only the information necessary for managing NPS museum collections.

You may later need to justify your actions, such as deaccessioning, through appropriate documentation. If you have not collected adequate documentation or disposed of the documentation, you may be in a difficult situation. You can avoid this problem by providing more generic information without potentially problematic specifics. For example, you may be able to state, "this ceremonial rattle relates to Spring ceremonies," as opposed to "this XXXX rattle is held by the YYYY priest, who does the following six things with it to induce corn fertility in the Spring."

4. *How does the Executive Order 13007—Indian Sacred Sites affect access and use?*

The NPS management guidelines for carrying out the Executive Order are being drafted and will be distributed when finalized.

5. *What are the traditionally associated groups' concerns about access and use?*

Traditionally associated groups may be concerned about a collection item or the knowledge associated with it. This includes:

- what the item represents to cultural insiders
- information on object use

- documentation of ritual observations or associated stories

Potential concerns may arise with:

- ***Use by the museum in:***
  - exhibitions
  - conservation treatments
  - collections management handling
  - research
  - publications (including text, Internet, sound records, and moving and still images)
- ***Use by the general public when:***
  - photographing
  - interpreting
  - viewing
  - researching
  - handling
- ***Ceremonial use by the associated communities in:***
  - ceremonies in the museum
  - off-site ceremonies and ritual observances

There may be culturally defined rules for transmitting and controlling knowledge about the collection, which may involve rituals or prohibitions. See *MH-III*, Chapter 2.

***Inform traditionally associated groups that NPS-held archives, manuscripts, and collections documentation are subject to FOIA.***

As manager of the park collections, you must strike a balance among the rights of the:

- creator and the creator's heirs (may have the copyrights)
- potential users
- taxpayers who fund use of collections

- park to have accurate and complete collection management information
- individuals and groups documented

6. *What limitations may apply to access and use?*

Collections information may have the following legal restrictions. See *MH-III*, Chapter 2 for specific guidance.

- ***Federal and state privacy and publicity law*** restrictions may apply to the words, images, and persona of living private individuals and celebrities (whether dead or alive), including photographs, family letters, oral and video history interviews and transcripts, and similar materials.
- ***Copyright*** restrictions may apply to the words and works of individuals depending upon when they were created, and if and when they have been published.
- ***Archeological Resources Protection Act*** restrictions apply to location information on archeological excavations. You must **not** grant access to the location of archeological sites, potential sites, or shipwrecks in records, databases, or any format, even if the request is a FOIA request.
- ***National Historic Preservation Act*** restrictions may protect the disclosure of information that can create a substantial risk of harm, theft, or destruction of historic resources, as well as preventing disclosures that invade privacy or impede the use of traditional religious sites by practitioners.

*Once made accessible to one researcher, archival and manuscript materials are available to all under the principle of equal access.*

7. *What are some factors in determining access to and use of cultural materials?*

Different groups may have different rules about how acceptable access and use procedures are determined. These include:

- ***Gender:*** some materials are not available to women or to men
- ***Age:*** some materials are available only to tribal elders as keepers of traditional knowledge
- ***Social and occupational role:*** a person's occupation or membership in particular groups may prohibit using an object
- ***Group membership:*** a group may request access or information be restricted to a particular group
- ***Cultural prohibitions on information:*** for example, viewing or photographing powerful objects may be prohibited

This is one area where traditionally associated group concerns and NPS policies may be in opposition. Remember, you provide equal access to NPS museum collections, unless restricted by law or in accordance with NPS policy. Work with traditionally associated groups to share federal laws and NPS mandates, policies, and procedures, and to develop acceptable strategies. It may be possible to provide:

- *Access during certain periods or only in certain spaces*
- *Access via a copy*
- *Access with notification*

Allow the affiliated group to leave a statement with the museum explaining why the information is sensitive and should not be published. Researchers requesting the item may be asked to read the statement before access is granted.

If both parties are willing, arrange a meeting between the researcher and the traditionally associated groups to address concerns. Speak to your SO curator, discipline specialists, NPS solicitor, and FOIA officer for guidance.

8. *How does the use context affect cultural concerns about access and use?*

Some potential concerns include:

- **Location:** allowing access to a room where a negative event occurred can be a source of power or danger according to some cultures; a location may have negative or positive connotations
- **Temporality:** allowing researchers or staff to use material at a certain time of day or during a particular season may be problematic according to some cultures; the group may want certain uses restricted by date or time
- **Object orientation:** placing an object so that it faces a particular direction in an exhibit or for research may be problematic in some cultures
- **Cultural context:** allowing access by a researcher from a different group, may be a cause for concern; associated groups may object to exhibiting or loaning collections to rival groups
- **Proximity to other objects:** storing sacred objects of a particular group in a room that also has human remains or funerary objects may be problematic for some cultures

The associated group may request that certain ritual considerations be followed before or after use of a collection, such as the blessing of space or a cleansing ceremony. However, potential contamination issues can occur from some ceremonial or ritual activities (for example, if cornmeal is used, it may provide habitat for insects). Work with the group to ensure they understand the reasons for NPS policies and procedures. Make alternative arrangements, where possible, to accommodate these concerns.

9. *What cultural issues may arise when the general public uses a collection?*

When a member of the general public uses a collection, traditionally associated groups may request that public and researcher use be supervised by their representative in addition to NPS staff supervision. A member of the traditionally associated group could accompany the supervisor as an observer, if management so chooses, but only NPS staff should provide supervision. Alternatively, the manager may permit a qualified member of a traditionally associated group *who is a NPS employee or volunteer* to supervise. Another option is for the concerned associated group to leave a statement of concerns to be provided to researchers when the collection is used.

The NPS follows the principle of equal access. The researcher has the right to unobstructed access. Instead of installing a secondary observer, such as a member of the traditionally associated group, which may have a chilling affect on research, work with the traditionally associated groups to identify problematic material and develop access strategies that meet both NPS and the traditionally associated groups' goals. The agreed-upon access and use policies for these materials will be honored to the fullest extent allowed by law.

***Work with traditionally associated groups to establish access procedures for sensitive cultural object(s) before providing access.***

Traditionally associated groups may also request that the NPS restrict a type of use. For example, the associated community may indicate that viewing, but not touching, an object is acceptable or that some objects or information should be excluded from public or ceremonial use. Share the concerns of the aggregated group with the person(s) requesting access. Append a statement of concerns if one is provided. Anyone can use NPS collections if the use conforms to NPS policies and procedures.

10. *What concerns affect how traditionally associated groups use museum collections?*

The following issues may affect how traditionally associated groups use a museum object:

- ***Restricted use due to contested or shared affiliation:*** When an object is affiliated with several groups or when affiliation is contested, one group may ask that another be excluded from consultations and using the collection. Inform individuals requesting restrictions this is counter to NPS policy.
- ***Special use:*** Associated groups may request use of the collection for ceremonial activities, not all of which contribute to preserving the object. For example, the use may result in contaminates from blessing or cleansing rituals or body paint on textiles.

Special uses must be judged equitably by the:

- effect of the use on the object
- applicable legal restrictions on access
- donor and lender restrictions on access
- **Off-site use:** A use request may be for an off-site ceremony because the location of the event may be critical to its success. All uses, including off-site uses, must follow NPS policies and procedures, such as preparing an outgoing loan agreement. Each off-site use request is considered individually. You should have a NPS employee present to supervise the uses that are not traditional museum uses.
- **On-site but unsupervised use:** An associated group may want to perform a ritual unsupervised by NPS, which is against NPS procedures. If a member of the associated community is a NPS employee or volunteer, then that person could provide the supervision.

The following may affect how traditionally associated groups use collection data:

- **Research and publication:** If one group researches and publishes the subject document(s) or archival materials, it has opened the door for authorization of all future research and publication requests, regardless of source, under FOIA and equal access.

Major research projects into a specific group's history, culture, or material culture initiated by NPS staff or an outsider should be undertaken in consultation with the traditionally associated groups where possible. There may be cultural concerns about who does the research, how the research is conducted, how the group will be represented in the study, and the distribution of the study. See *Cultural Resource Management Guideline* for guidance.

11. *What cultural concerns affect the use of natural history collections?*

Most cultural concerns affecting use of natural history collections mirror the concerns discussed above. Specific issues for natural history collections include:

- **Use and value:** The specimen may have multiple uses and values for one community, such as the yucca that has subsistence and ceremonial uses. These uses and values may be related to the traditionally associated groups' subsistence needs, or may be religious or ceremonial in nature. Refer to *Cultural Resource Management Guideline*, Chapter 10, Management of Ethnographic Resources.
- **Meanings:** The specimen(s) can have multiple meanings for different groups; for example, a bear skull can represent subsistence activities of one community, while it has ritual significance for another.

Associated groups may request that NPS restrict access to or use of certain information. This information may violate the parameters governing transmission of knowledge within a particular culture, for example:

- ***Ceremonial or medicinal access concerns:*** Groups may request that NPS restrict access to information on the ceremonial or medicinal uses of certain plants. For example, the medicinal qualities of a plant may be limited to all but a healer or midwife within the requesting culture.
- ***Plant locations:*** Groups may request that NPS restrict subsistence plant locations, especially for plants that gain power from a particular location.

Provide equal access to NPS collections with a few uniformly applied legal exceptions. According to the ethics policies of AAM and ICOM, and FOIA (for archives and museum documentation), if materials are available to one group they must be equally accessible to all. See Section D, Ethical Issues, Question 2.

12. *What other concerns may the traditionally associated groups have?*

Traditionally associated groups may be concerned about:

- scientific testing
- extensive handling
- reformatting or copying

Explain to the associated group, as you do to all users of NPS collections, how NPS staff care for collections. Share NPS guidance with the group. Consider inviting a member of the associated group to attend NPS collections management training. Where reasonable, legal, and ethical, follow the wishes of the associated group.

13. *When must I be sensitive to the concerns of traditionally associated groups?*

Always. Work with traditionally associated groups when developing procedures for using museum collections. Respectfully listen, understand, and honor concerns if they are legally, ethically, and reasonably possible under NPS policy and procedures. You should consult with the traditionally associated groups *before* access is provided.

***If the object, associated knowledge, use, or rituals have religious connotations or cultural restrictions, involve the associated group, where possible, in developing procedures to use and care for the object.***

14. *What do I do if I can't grant a traditionally associated group's request?*

If traditionally associated groups have made special requests for restricting or approving access or use of museum collections, it is important to work with them, even if their request can't be granted. Explain to them what NPS policies and federal and state laws dictate for access to NPS museum collections. Consult with your SO curator and ethnographer prior to meeting with the group to determine how best to ensure your message will be understood.

The group you are working with may have culturally defined roles and a specific context for transmitting knowledge on the associated materials. Some groups won't object to NPS doing research for management purposes, but they may want the data kept confidential. Because we can't guarantee confidentiality due to FOIA and state Sunshine laws, it is important to inform the groups of these legal constraints. In other cases, the group may request research, especially if its members are concerned that traditional knowledge is dying and they see NPS as a repository for their knowledge.

15. *What religious concerns must I consider?*

Cultural issues that affect use of religious item(s), include those discussed in Questions 1, 8, and 10. Identify the associated groups and religious concerns related to the collection. Sacred objects often require culturally specific procedures for care and use. Cultural rules governing the handling and use of an item may vary. See *NPS Management Policies* and *Cultural Resource Management Guideline*. *NPS Management Policies, Chapter 5:11, Ethnographic Resources*, requires that:

*Certain contemporary Native American and other communities are permitted by law, regulation or policy to pursue customary religious . . . and other cultural uses of park resources with which they are traditionally associated . . . .*

NPS Management Policies, Chapter 8:9, Native American Use, states that in keeping with the spirit of the American Religious Freedom Act (42 USC 1996),

*The NPS will be as unrestrictive as possible in permitting Native American access to and use of traditional sacred resources for customary ceremonies.*

and continues,

*. . . requests to conduct Native American activities will be subject to the same criteria as other special park uses unless the activity is specifically authorized by federal statute or treaty right.*

*Management Policies* also states that the NPS will ensure the following:

*. . . access to and use of natural and cultural resources in parks will be applied in an informed and balanced manner that is consistent with park purposes and does not unreasonably interfere with Native American use of . . . sacred resources and does not result in the degradation of park resources (8:9).*

Traditionally associated group(s) may request restrictions on access or use of information about the collection to cultural insiders or specific community members. The traditionally associated groups may:

- request specific procedures to protect the sacredness of the item, or to protect the people who come into contact with the item (See discussion in Question 1.)

- have cultural prohibitions on handling or viewing objects connected with a burial
- want to desanctify sacred objects in NPS custody, eliminating potential religious issues

Follow NPS policies and procedures, and legal guidelines for culturally sensitive collections, just as you do for all collections. Consult with your SO curator, FOIA officer, and the NPS solicitor if you have questions.

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## F. Scientific Issues

### 1. *What is a natural history type specimen?*

A type specimen is the actual specimen or series of specimens used to describe a taxonomic species or subspecies. It functions as the "name-bearer" of the species designated in the description of a species. Type specimens are the bearers of the scientific names for all taxa. There are several categories of type specimens, such as, holotype, isotype, paratype, and topotype. Refer to the *MH-II*, Appendix H, Natural History, for additional information on type specimens.

### 2. *What do I need to know about the use of type specimens?*

Type specimens are critically important to the scientific community and researchers because they are the international reference standards that provide objectivity in scientific nomenclature. It is an internationally accepted practice that all types are to be held in trust for science by those responsible for their safekeeping. In particular, type specimens are important to management of park natural resources.

Make every effort to ensure these specimens are readily available for present and future research, and for new and developing non-invasive analytical technologies by:

- maintaining them in good condition in a stable environment
- housing them in separate and secure housing within the museum storage area
- closely monitoring and controlling their access and use.

All requests to use a type specimen or series and associated collection data should be in writing. Students should include letters of recommendation from their advisors. The letters should include the type specimen(s) to be examined, and the nature of the use. Researchers should be able to demonstrate they are qualified to conduct the research, and that the particular type specimen(s) requested are critical to their research project. Consumptive use of type specimens is not allowed. See Section C, Question 5 above, for information on consumptive use of specimens.

***Type specimens, in particular holotypes, should not be loaned from the collection unless they are on loan to a repository for management and storage purposes where they may be made available for research purposes.***

Consult with the SO curator and specific systematic discipline specialists if you receive a request to borrow a type specimen.

3. *What are voucher specimens?*

The voucher specimen is proof, as a single specimen or series of specimens, of the existence of a species at a particular time and place. The presence of a voucher supports the tracking of habitat and geographic expansion of a species, or the presence or absence of a species following changes in its habitat.

The *Guidelines for Institutional Policies and Planning Natural History Collections* published by the Association of Systematics Collections (ASC), 1994, states that the voucher is a:

*. . . specimen and its associated data that physically document the existence of that organism or object at a given place and time.*

The *Guidelines for Acquisition and Management of Biological Specimens*, edited by Welton Lee et al, published by ASC, 1982, notes the following:

*Voucher specimens ensure that the identification of organisms studied can be verified . . . They are the sole means to verify the data documented in a report . . . and to make historical comparison possible . . . they provide critical information . . . for future investigations . . .*

4. *What do I need to know about the use of voucher specimens?*

Because of their importance in validating a study, voucher specimens must be documented thoroughly with field and other relevant reports. They must be maintained in good condition and be accessible to researchers.

Requests to use voucher specimens should be in writing. Refer to Question 2 above for what should be included in the request.

Because voucher specimens validate a study, don't allow consumptive use. In rare cases, consumptive use of voucher specimens is possible with approved justification. Consult with the SO curator and specific systematic discipline specialists if you get a consumptive use request. You may lend voucher specimens.

5. *What do I need to know about the use of threatened and endangered species?*

Be familiar with NPS responsibilities in the management of endangered, threatened, and rare species, and candidate and sensitive species. Refer to *Natural Resources Management Guideline*, Chapter 2, Endangered, Threatened, and Rare Species Management. NPS museum collections include threatened and endangered (T&E) species and candidate species. Requests to use T&E species should be in writing. Consumptive use of T&E is possible with a written justification. Refer to *Cultural Resource Management Guideline*, Chapter 9, Management of Museum Objects, Consumptive Use of Museum Objects.

You may lend T&E species. You don't need a permit to loan threatened or endangered species within the United States if they were taken lawfully and "if there is no barter, credit, other form of compensation, or intent to profit or gain . . ." *Fish & Wildlife Facts*, U.S. Department of the Interior, Fish and Wildlife Service (FWS). However, you must get an export permit from the FWS for loaning T&E specimens outside the U.S. The export permit covers the Endangered Species Act as well as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Under these regulations, the U.S. established procedures to regulate the import and export of the species covered by the treaty. FWS, Office of Management Authority acts as the U.S. Management Authority for CITES. You'll also need to get an import permit to cover the loan return. You can get the permit from:

Fish and Wildlife Service  
Office of Management Authority  
4401 North Fairfax Drive  
Room 430  
Arlington, VA 22203  
Tel: (800) 358-2104

For additional information, see the following FWS booklets, also available from the above address:

*CITES, Appendices I, II, and III, to the Convention on International Trade in Endangered Species of Wild Flora and Fauna.* August 12, 1996.

*Endangered and Threatened Wildlife and Plants.* 50 CFR 17.11 and 17.12. October 31, 1996.

6. *What do I need to know about access to information about threatened and endangered species?*

Location information on nesting sites or other specific habitat information on threatened and endangered species is extremely sensitive. Consistent with the purpose of the Endangered Species Act (16 USC 1531 et seq.), the NPS

*. . . will promote the conservation of all federally listed threatened, endangered, or candidate species within park boundaries and their critical habitats. As necessary, the Park Service will control visitor access to and use of critical habitats, and it may close such areas to entry for other than official purposes . . .*

*Management Policies*, Chapter 4, Natural Resource Management, Threatened or Endangered Plants and Animals.

In accordance with NPS Management Policies, you should control carefully access to this information. You should make these data available only in response to a written FOIA request. If you get such a request,

immediately contact your FOIA officer, chief of Natural Resources, SO curator, and solicitor. For further information, see *MH-III*, Chapter 2, Legal Issues.

## G. Preservation and Protection Issues

### 1. *How do I balance preservation and use?*

Both preservation and use are fundamental to a successful museum program. Collections are maintained because of their value to the park, the NPS programs, and the general public, who provides the funding. If your museum focuses on preservation to the exclusion of collection access and use, you are not meeting NPS or museum standards.

Neither preservation nor use are absolute values. One should not be given preference over the other. If you make informed decisions based on NPS policies and procedures, you will effectively manage and balance both preservation and use without significant compromises.

### 2. *How do I preserve collections?*

- ***Material stabilization***

Museum materials deteriorate over time. The goal of a balanced preservation and use program is to minimize collection deterioration, while maximizing access. Deterioration can be slowed greatly through the following actions.

- Use proper storage and housing techniques and materials. See *MH-I*, Chapter 7, Museum Collections Storage.
- Conduct collection condition surveys of materials and implement restricted handling procedures when recommended. See *MH-I*, Chapter 3, Museum Objects Preservation.
- Provide treatment when necessary (for example, mending tears or rips in paper documents). See *MH-I*, Chapter 8, Museum Object Conservation Treatment.

- ***Proper handling***

- Train staff and researchers how and why to handle all the types of objects and materials in the collection. See *MH-I*, Chapter 6, Handling, Packing, and Shipping Museum Objects.
- Monitor all use for improper handling techniques, theft, or vandalism. See *MH-I*, Chapter 6, and *MH-II*, Appendix D, Museum Archives and Manuscript Collections.
- Provide copies, duplicates, facsimiles, record photographs, or reproductions for research when an item is fragile, of high value, or vulnerable to damage, alteration, or theft.

- Document the collections to establish and maintain accountability and to monitor and track preventive maintenance.
  - Keep proper records, such as researcher registration, copyright and privacy statements, and duplication forms, to track use of an object or a collection and any theft or vandalism.
  - Encourage users to make initial surveys of holdings using images and documentation, rather than original objects, as they narrow the focus of their research.
- ***Proper storage environment***
    - Monitor and control temperature, relative humidity (RH), and light levels. See *MH-I*, Chapter 4, Museum Collections Environment.
    - Establish and maintain an Integrated Pest Management program. See *MH-I*, Chapter 5, Biological Infestations.
    - Establish and implement security and fire protection procedures. See *MH-I*, Chapter 9, Museum Collection Security and Fire Protection.

Deterioration of museum collections can't be totally halted, only slowed. Access and use must be provided and encouraged, while preserving and protecting the collections.

3. *How do I allow access to and use of collections?*

Access and use of collections must be done systematically in order to minimize the risks of:

- theft
- mishandling
- vandalism
- lawsuits due to intellectual property rights infringements, such as copyright or privacy infringements
- letters of complaint to Congress and superintendents resulting in investigations and audits

For further guidance, see *MH-I*, Chapter 9, Museum Collections Security and Fire Protection and Appendix G, Protection of NPS Museum Collections, and *MH-II*, Appendix D, Museum Archives and Manuscript Collections.

4. *What steps are necessary for providing access to and use of collections without critically affecting collection preservation?*

To effectively balance preservation and use of the park's museum collections, you must follow the standard management steps listed below:

- Review your collection restrictions for legality under FOIA, state Sunshine laws, Archeological Resources Protection Act (ARPA), and other laws outlined in *MH-III*, Chapter 2, *before* you provide access.
- Decide access and use policies and procedures *before* you provide access.
- Train all staff how to apply and follow these policies and procedures (including worst case scenarios, such as how to react in case of theft, vandalism, lawsuits, and mishandling) *before* they provide access.
- Make sure the park staff have and understand how to use all necessary forms for access and use, including forms for researcher registration, copyright and privacy legislation, model and interview releases, and duplication *before* providing access. See *MH-II*, Appendix D.
- Ensure the park staff understand that all researchers, *including park staff*, must be monitored while using collections.
- Show researchers how to handle and use museum collections when they first register to use collections. (*Note:* To simplify this task, you may want to ask the researcher to view a videotape or Web site on this topic.)
- Provide an appropriate space for use as a research or reading room.
- Provide adequate space in the research room for needed research equipment.
- Ensure that researchers sign all forms, such as researcher registration forms, copyright and privacy statements, and researcher duplication forms, so that NPS is protected from potential legal problems and so researchers can be held legally liable for any mishandling.
- Pay attention to how researchers handle materials and tactfully correct any handling problems.
- Monitor and manage your research or reading room environment. See *MH-III*, Appendix D, Guidance on Planning for a Research Space.
- Never store collections in the research room.
- Don't provide access in storage rooms (even if collections are in locked cabinets).

***Never leave any researcher unsupervised or unmonitored in areas with collection materials.***

5. *How do I assess physical condition?*

Use the following tools to help assess the condition of your park's museum collection:

- ***The Collection Management Plan (CMP)*** provides both short- and long-term guidance to parks for managing and caring for objects. The CMP assesses the park's collection management program, identifies problems, and recommends corrections. The subsequent action plan developed by the park identifies and prioritizes corrective actions and specifies needed resources. See *MH-I*, Chapter 3, Museum Objects Preservation, and Appendix F, Museum Collection Management Checklists.
- ***The Collection Condition Survey (CCS)*** is an assessment of the condition of the objects in a collection by a qualified conservator. It looks at objects either individually or in groups of similar materials and their treatment needs. The survey explores the factors that can affect the collections, including ways that collections are used in exhibits, interpretation, education, and research. The report can be used as a tool to develop a systematic approach to improving the conditions of collections and create a baseline for future assessments of object deterioration. See *MH-I*, Chapter 3, Museum Objects Preservation.
- ***The Archival Assessment***, which can be completed as part of a CMP or on its own, evaluates a park's archival and manuscript collection management needs, incorporating collection surveys and evaluations. See *MH-II*, Appendix D, Museum Archives and Manuscript Collections. The survey reports and recommendations from this assessment can help you evaluate the condition of your archival and manuscript collections.
- ***The Object Condition Report and Object Treatment Report*** are prepared by a conservator before and after conservation treatment of an object. The Condition Report provides a description of the materials, structure, and condition of the object based on any observed deterioration and is also used to document the condition of an object before and after loan, exhibit, or other activities. The Treatment Report describes the procedures, materials, method, and extent of treatment. See *MH-I*, Chapter 8, Museum Object Conservation Treatment. The curator keeps these completed reports in the accession or catalog folder, where they can be consulted to determine object condition when a use proposal is received.
- ***Developing a critical eye*** is a skill learned through experience and training for evaluating object condition. This is discussed in *MH-I*, Chapter 4, Museum Collections Environment, Section B. Over time you can become expert in assessing visual clues that signal an object's condition.

6. *How do I assess physical and mechanical preservation risks associated with the proposed use and how can I prevent damage?*

Physical damage includes:

- melting
- burning
- warping
- buckling
- shrinking
- softening binders, such as gelatin or albumen

This type of deterioration results from poor or widely fluctuating climatic conditions.

Prevent physical damage by stabilizing climatic conditions.

Mechanical damage includes:

- tearing, breaking, cracking, or chipping
- scratching or abrading
- soiling or smudging
- creasing or wrinkling

This type of deterioration results from careless and improper object handling and use, neglect, or vandalism.

Prevent mechanical damage by following this advice.

- Make sure that users know your handling policies and procedures. For General Rules on Handling Museum Objects, see *MH-I*, Chapter 6, Handling, Packing, and Shipping, Section C.
- Provide users with a clean, stable, and well-lighted environment.
- Don't allow pens, knives, or similar materials where objects are being used.
- Require and provide No. 2 graphite pencils for notetaking.
- Require researchers to wash their hands and wear gloves, as appropriate, when working with museum collections.
- Register and continuously monitor all researchers
- If you find any signs of vandalism or theft, such as illustrations cut out of historic volumes, check the registration records and determine who has used the collection. Look for a pattern in the damage. If only one

researcher had access to the particular object or collection, this tells you who might have stolen or damaged the material. Contact NPS law enforcement and your SO curator who will inform other parks to watch for this individual.

7. *What are the chemical risks and how can they be avoided?*

Chemical damage includes:

- oxidation, such as rusting
- corrosion
- damage to pigments
- some staining

This type of damage is caused by reaction to another chemical, such as air pollution or oils from a user's hands.

Photochemical damage includes:

- some staining
- color shifts
- fading
- flaking media
- embrittlement of textiles and paper

This type of damage is caused by exposure to excessive light levels.

Chemical risks associated with use can be avoided by following this advice.

- Monitor and manage your storage, work, exhibition, and research room environments.
- Establish a light monitoring program in exhibit and research areas. Correct light levels that exceed standards. See *MH-I*, Chapter 4, Museum Collections Environment, Section E.
- Follow the guidelines in *MH-I*, and the *COGs* for specific types of material.
- Limit the level and duration of light in all museum spaces.

8. *What are the biological risks and how can they be avoided?*

Biological damage includes:

- mold and fungal growth
- insect damage or residue

- rats, squirrels, mice, and other vermin damage or residue

Prevent biological damage by doing the following:

- Don't allow smoking, drinking, eating, chewing, or similar activity in the research room.
- Institute an Integrated Pest Management Program.
- Keep plants and animals out of storage, exhibition areas, research rooms, and work spaces.
- Monitor and manage your storage, exhibition areas, work space, and research room environments.
- Follow the guidelines in *MH-I*, Chapter 5, Biological Infestations, and the COGs for specific types of material.

9. *What are the security risks associated with the proposed use?*

Security problems may include:

- collection vandalism, such as ripping, marking, or damaging collections

Follow the procedures described above and in Question 6.

- theft by staff or outside researchers

Contact NPS law enforcement staff and SO curator immediately. Assemble all pertinent accession and catalog records, as well as researcher registration documentation on researchers who have requested access to the stolen materials during the last several years. See *MH-II*, Chapter 4, Inventory and Other Special Instructions, Section III on loss.

- misplacement or temporary loss of collection materials

Look at which researchers used the materials most recently. Identify what other collections they worked with and check those locations. If you still can't find the missing materials, assemble all researcher registration and use information and contact your law enforcement officer and SO curator.

- damage during loans

See *MH-II*, Chapter 5, Outgoing Loans.

- damage during transportation

See *MH-I*, Chapter 6, Handling, Packing and Shipping Museum Objects.

- damage during exhibitions, especially in open display and furnished historic structures without protective enclosures

Except for historic period settings, this open display technique should be avoided.

- damage during duplication

See *COG 19/12 Contracting for Reformatting of Photographs*.

- arson and fire damage

See *MH-I*, Chapter 9, Museum Collections Security and Fire Protection.

10. *How do I prevent security problems?*

Security problems can be avoided or minimized when you follow the guidance below:

- Provide continuously supervised access to museum collections. If supervision is not possible, you may refuse access if the refusal is temporary and applied equally to all researchers, including staff. See *MH-I*, Chapter 9, Museum Collections Security and Fire Protection, and *MH-II*, Appendix D, Museum Archives and Manuscript Collections, Sections T and U.
- Restrict access to unaccessioned and uncataloged museum collections and to not yet cataloged, described, arranged, or rehoused archival and manuscript materials. You may refuse access if the refusal is temporary and applied equally to all researchers, including staff.
- Provide additional supervision for access to original, high value, highly collectible, or similar objects (for example autograph materials, gold jewelry). Limit the number of objects to one or a few that you provide at one time to researchers, or make photographs or reproductions (such as digital, xerographic, or microfilm copies) available for use.
- Refuse access to researchers with a record of thievery or vandalism towards museum, archival, or library collections. Contact organizations listed in *MH-II*, Chapter 4, Section C, Reporting Loss of Museum Objects, to get information on convicted thieves and vandals. In the case of the destructive individual or documented thief, consult with your NPS law enforcement staff, the SO curator, and the NPS solicitor for remedies.
- Develop and implement researcher (including staff) registration procedures. See Section J, Documentation.
- Establish and implement research room operating procedures for monitoring and duplication. See *MH-II*, Appendix D, Museum Archives and Manuscript Collections.
- Follow outgoing loan procedures. See *MH-II*, Chapter 5, Outgoing Loans.

- Establish and follow exhibition procedures. See *MH-III*, Chapter 7, Using Museum Objects in Exhibits (in prep).
- Implement duplication forms and procedures. See *MH-II*, Appendix D, Museum Archives and Manuscript Collections.

11. *How do I deal with a disturbed, thieving, or destructive individual?*

Beyond the security issues described above, you may have to deal occasionally with angry, dissatisfied, or disgruntled visitors. When this occurs, you must follow these procedures:

- Ask for back-up from another collections person, so you have a witness.
- Locate another staff member to handle the research room.
- React in a calm, empathic, and tactful manner, without yelling or arguing.
- Determine what the researcher's concern is and restate the concern, so it is clear you understand it.
- Calmly inform the visitor of the NPS policy or procedure that covers the situation.
- Tell your visitor that you are expected to execute the procedure or policy the same way for all visitors.
- Explain that you are personally held accountable by a supervisor for applying the procedure equitably.
- Offer to show the visitor the policy or procedure.
- Offer to take the visitor to your park's public affairs officer or park ranger headquarters.
- Encourage the visitor to leave the research room, but *don't* touch the individual.
- Call the park law enforcement officers to defuse the situation if the individual becomes violent or abusive. Ideally ask the person to step outside and then lock the door to the research room. Notify the park public relations officer.

12. *How do I deal with staff theft?*

Don't confront the suspect. The thief may destroy essential collections documentation or hurt you. Report your concerns, with related facts or documentation, to law enforcement and the individual's supervisor or the park superintendent.

The supervisor and park superintendent will determine if the individual should be placed on administrative or other leave during the investigation. The suspect must be given a chance to clear his or her name without placing any portion of the museum collection at risk.

If a theft occurs, gather all appropriate collections documentation to indicate what was stolen, including catalog records, inventories, and researcher registration information. Follow the guidelines in *MH-II*, Chapter 4, Inventory and Other Special Instructions, Section III, Reporting Loss of Museum Objects.

Don't try to hide thefts. Work with NPS law enforcement officers, solicitors, and other museums, archives, dealers, and professionals to recover your stolen materials.

13. *How do I use a facilities report to evaluate risk?*

When your museum receives a loan request, you should request a completed facility report from the borrowing institution. See *MH-II*, Chapter 5, Outgoing Loans. This report details that institution's physical condition and the standard practices of its staff. It can uncover potential security, handling, or environmental problems that can be resolved before the loan is made.

A facility report typically provides information about the borrower's environmental controls, security, fire protection, and ability to care for and handle collections. You can use this information to determine the risk of lending the object by verifying the borrower will care for your objects properly. See *MH-II*, Chapter 5, Outgoing Loans. A standard facility report is published by the American Association of Museums Registrars Committee. Parks can contact NPS Museum Management Program for a copy.

14. *How do I protect objects from overuse?*

Monitor collection use. Refer to the researcher log book and researcher registration forms to determine frequency of use of a particular collection or object.

Look at the level of light exposure the objects are receiving. See *MH-I*, Chapter 4, Museum Collections Environment. If fragile or vulnerable materials are exposed to light levels exceeding those recommended for exhibitions, consider reformatting the materials via digital and microfilm copies.

Rotate objects on exhibit. See *MH-III*, Chapter 7, Using Museum Objects in Exhibits (in prep.).

If microfilm and digital copies are not an option, consider producing a master set of xerographic copies on acid-free paper of high-use materials. For three-dimensional materials, have high-quality record photographs made and later scanned for use.

If certain archival collections are heavily used for research or duplication for more than a month, have them reformatted into microfilm and digital formats for access. The original can then be retired to the museum storage space for preservation.

Computer software manufacturers are developing ways to turn digitized files of photographs into "virtual" museum objects so you may provide three-dimensional reference files of museum objects in CD-ROMS, on your hard drive, or on the World Wide Web. This technology makes your collections accessible to a wider audience.

15. *What do I do if objects are damaged?*

If an object is broken or damaged during use, return the object to storage until it can be stabilized and treated. Document damage on the catalog card and supplement with photographs. If the item is destroyed, follow the guidance in *MH-II*, Chapter 4, Section III, Reporting Loss of Museum Objects. Consult a conservator for treatment recommendations.

Damaged archival and manuscript items must be stabilized before they may be made available. If the damaged item forms part of a group of materials (for example, one document in a box of archival documents), replace it with a separation sheet and a xerographic copy. The separation sheet will indicate the new storage location of the item. Put the damaged original in safe storage until it can be treated by a conservator. See *MH-II*, Appendix D, Museum Archives and Manuscript Collections.

16. *How do I recognize over-use?*

When materials show obvious damage, such as fading, wrinkling, tearing, smearing, surface losses, abrading, wear, or other damage discussed in Question 4, they are being over-used. When reviewing accession or catalog files or the researcher log book, if you notice repeated use by researchers of the same object or collection, you should examine these items immediately for signs of wear.

By monitoring files and log books and inspecting object condition as they are returned to storage following use, you may anticipate potential over-use before objects reach this state. Consult a conservator if you question whether an object has become too fragile or vulnerable for further use without treatment.

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## H. Interpretation Issues

1. *What is NPS interpretation?*

Interpretation links park resources and the values, ideas, and meanings of the people who used them. The goal of NPS interpretation is to allow visitors to forge relationships with NPS resources. Museum collections are both park resources and a means to interpret and further the mission of the park and the NPS Servicewide.

2. *What is the NPS interpreter's role in using museum collections?*

The interpreter's role is to help visitors discover some of the uses of and values represented by the resources they see and experience in the park. You should work with interpretive staff to make museum collections a vital part of the park's interpretive program to:

*. . . assure that the interpretive process manifests a variety of cultural and intellectual perspectives and reflects an appreciation for the diversity of the museums' public dimension.*

as noted in the 1992 American Association of Museums report *Excellence and Equity, Education and the Public Dimension of Museums*.

The museum collections are part of a park's fabric. Museum collections enrich our knowledge, understanding, and appreciation of the park's mission and goals. The interpreter helps the visitor appreciate and understand park resources so that:

*Objects are no longer viewed solely as things in themselves, but as things with complex contexts and associated value-laden significance . . . Changing interpretive approaches will have a strong impact on museum collections and the public's understanding of them . . .*

*Excellence and Equity, Education and the Public Dimension of Museums, American Association of Museums.*

Effective NPS interpretation should help the visitor connect the objects, the people who used them, collections research, and the park mission. Museum collections interpretation should provide "enriching experiences through the interaction of objects and ideas."

3. *How do I determine the appropriateness of the proposed use?*

You can use objects effectively in educational and interpretive programs. Museum collections are park resources, but they also help to convey to the visitor the park's history and mission.

Use the following considerations to determine if an object is appropriate and an effective means to meet your interpretive objectives.

- Value-related considerations

Determine:

- what specific linkages you're trying to convey through the use of the objects
- if these relationships are connected to your specific interpretive themes and the NPS thematic framework (see *Revision of the National Park Service' Thematic Framework*, 1996)
- if use of objects will improve significantly the visitors' understanding of the park's mission, goal, history, and resources
- if the proposed use respects the creator's (if any) intent, original use, and context of the objects, or if it recognizes its original setting and association with other objects
- if you know enough about the objects to use them accurately and sensitively
- if the information you plan to share about the objects is accurate and balanced
- if the information is current and from authoritative sources

- Condition-related considerations

Determine:

- if the objects can be used or displayed safely without risking loss or damage
- if all who will work with the materials have been taught appropriate handling and use procedures, and have been appropriately and continuously supervised in such use
- if you have enough objects that meet the theme-related requirements listed above to skip using a fragile piece
- if you can use a variety of objects in a regular rotation to lessen damage from over-exposure or handling of any one object

4. *Are there alternatives to using the proposed object?*

You need to ask whether there is a viable alternative to using this particular object. The alternative may be recommending using a similar but less fragile or valuable object, or a reproduction item. You should then ask if an original object is essential for the link you are trying to convey, or could a reproduction or other representation be substituted effectively?

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## I. User Qualifications

1. *What credentials must users present when requesting access to collections?*

Since museum objects and museum archival and manuscript collections have different access and use traditions, access is different for the two types of collections.

- Museum Objects

Museums traditionally provide collections access to scholars, private individuals, and staff by appointment. The public generally has access to museum collections through exhibitions, catalogs, educational programs, and multimedia. In the last decade museums have moved toward providing access to a broader spectrum of the public with learning centers, interpretive programs, and electronic and interactive access.

Museums require some information on a researcher's background sufficient to evaluate whether the proposed use is appropriate. This background information includes:

- the presentation of credentials (such as university affiliation and drivers license)
- a request for an appointment to obtain museum collection access briefly outlining:

researcher's name, address, institutional affiliation, if applicable

project summary (the topics and materials to be studied and methodology)

project duration

publication plans

special support needs, such as photography of objects

All users must complete a researcher registration form accompanied by showing a drivers license or other picture identification.

Evaluate each request, and, if appropriate, arrange for the researcher to use the collection. The user completes and signs forms outlined in Section J, Documentation.

- Museum Archival and Manuscript Collections

Museum archival and manuscript collections come out of the archives and library access and use tradition. Most state and federal archives and libraries provide access to all.

The only individuals restricted from using the collections are those who previously have stolen or vandalized archival collections. Professional organizations of archivists and librarians, such as the Society of American Archivists circulate information on convicted thieves and vandals. The only archival access requirement is that the archives must have something on the topic being researched and the researcher has a demonstrated need for primary source material. See *MH-II*, Appendix D, Museum Archives and Manuscript Collection.

Sheer curiosity is not a demonstrated need for handling original archival materials. Courteously show curious visitors exhibitions, publications, and reformatted copies, but don't allow them to handle original materials (except for research and those materials approved for consumptive use), as extensive handling affects the life of collections.

Archives generally require that the documents listed in Section J, Documentation, be completed and signed.

2. *How would the user's qualifications affect an access request?*

The weight of user qualification on whether a researcher gains access to collections depends upon whether the request is for use of museum objects or archival and manuscript collections. In the cases of both museum and archival research, an appointment for research may be necessary, such as when a park has limited space or staff or the objects require conservation treatment.

- Museum Objects

Museum collections are available to any user as long as the use does not endanger the object's preservation and security, conflict with federal or state legislation, or NPS policy.

- Museum Archival and Manuscript Collections

By state and federal law all, visitors and researchers may have access to all museum archival and manuscript collections (with a few specific statutory or donor-specific restrictions). The user's qualifications have no effect.

There are no systematic excuses for refusing access. Parks must provide good-faith attempts to make their archival and manuscript collections available. Every attempt should be made to provide prompt, courteous, and accurate reference support.

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## J. Documentation

### 1. *How do I document access and use of collections?*

Don't provide access to the collections until the following documents are completed.

- Researcher Logbook

Maintain a researcher logbook and require the researcher to sign each time he enters or leaves the research room. See *MH-I*, Appendix G, Museum Collection Protection, Figure G.6, Sample Visitor Log, and G.7, Conditions for Access to Museum Collections; and *MH-II*, Appendix D, Museum Archives and Manuscript Collections.

- Access Policies and Rules Governing Use Statement

When entering a museum's research room, this is the first document the researcher sees. This statement provides a clear concise overview of the museum's rules on access, citations, research room rules, permission to publish requirements, and handling policies. The researcher must read and sign this statement before he can register to use the collection. See *MH-I*, Appendix G, Figure G.5, Sample Park Museum Collection Access Policy and Procedures and *MH-II*, Appendix D, Figure D.13a-b, Access Policies and Rules Governing Use for a sample statement.

- Researcher Registration Form

After reading the Access Policies and Rules Governing Use, the researcher must complete a Researcher Registration Form.

A Researcher Registration Form includes the date and information about the researcher, institutional affiliation, and a summary of the research project and publication plans. The names of the collections used, and boxes of archival collections used and the name and accession numbers of the museum objects viewed are noted on the reverse of the form. See *MH-II*, Appendix D, Figure D.16.

- Copyright and Privacy Restriction Statement

Immediately after registering, the researcher reads and signs a Copyright/Privacy Restriction Statement. This statement explains the legal uses of park collections under the copyright and privacy acts, and alerts the researcher about misuse of protected materials.

The document contains an indemnification statement holding the researcher legally liable for any misuse and indemnifying the NPS from all claims, demands, losses, and damages arising out of legal actions due to the researcher's misuse of materials. This researcher signs this statement prior to collection use. See *MH-II*, Appendix D, Figure D.15.

- Duplication Forms

When the researcher requests photographic or xerographic (photocopies) copies or equivalent digital files, microfilm, or other copies, the researcher completes a Researcher Duplication Form. This form includes the researcher's name, date the order was filled and who filled it, reason for the copies (such as publication, research), special duplication needs (for example, rush orders, blow-ups), and material to be copied (collection, location, description, and number and type of copy).

A Duplication Form contains an indemnification statement, holding the researcher responsible for all illegal use of the material and indemnifying the park from any legal liability resulting from misuse. The researcher signs and dates this statement before duplication takes place. See *MH-II*, Appendix D, Figure D.14.

2. *When should I use an outgoing loan agreement?*

You can lend museum objects from the park museum collection for a variety of purposes. These include:

- exhibition
- research
- scientific or exhibit preparation
- analysis
- photography
- conservation or other services requested by the park

Museum collections also are loaned for long-term collections management and storage. You must use an outgoing loan agreement whenever you generate an outgoing loan transaction. Refer to *MH-II*, Chapter 5, Outgoing Loans for detailed information on outgoing loans.

**K. Checklist: Evaluating a Request to Use Museum Objects**

*[Park Name/Address]*

**Requested by:** Name: \_\_\_\_\_ Title: \_\_\_\_\_

Institution: \_\_\_\_\_ Date requested: \_\_\_\_\_

Address: \_\_\_\_\_

Tel/e-mail: \_\_\_\_\_

**Staff evaluator:** Name: \_\_\_\_\_ Title: \_\_\_\_\_

**Proposed use is for:** Publication Exhibit Interpretation/Education Research Project Destructive Analysis Other  
Explain:

**Benefits to:** Park/NPS Association group User Discipline/Profession Other  
Explain:

**Laws affecting this request:** Copyright FOIA Privacy Publicity Case law Other  
Explain:

**Management issues:** User supervision available Work space available Associated data can be used  
Objects are: Accessioned Cataloged Entered in ANCS  
Data needs to be restricted. Explain:

**Ethical issues:** Employee ethics concerns Professional ethics concerns  
Explain:

**Cultural concerns:** Affect use of natural history collections Sensitive issues related to associated groups  
Religious concerns Consultation with traditionally associated groups  
Explain:

**Scientific uses:** Type specimens Voucher specimens Threatened and endangered species  
Explain:

**Preservation and protection issues:** Borrowing institution facility meets NPS outgoing loan standards  
The object is in good physical condition appropriate for the proposed use  
There are: Mechanical risks Biological risks Chemical risks Security risks  
Explain:

**Interpretation issues:** Object essential for proposed use Traditionally associated group's concerns respected  
Alternatives to using proposed object: Photograph Reproduction Microfilm Digital copy Other  
None:  
Explain:

**Documentation issues** (Forms Completed): Researcher Registration Copyright/Privacy Statement  
Duplication Form Outgoing Loan Other  
Explain:

**The User:** Presented credentials Agrees to provide \_\_\_\_\_courtesy copies to the park  
Agrees to provide the following additional items for the park: Digital copies Posters Other:  
Explain:

User publication plans are:

Agrees to credit the park as follows:

Approved by \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

**L. Bibliography**

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