

**National Park Service
U.S. Department of the Interior**



SCOPE OF COLLECTION STATEMENT

PULLMAN NATIONAL MONUMENT



National Park Service, 2015

October 2020

Scope of Collection Statement

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EXECUTIVE SUMMARY

As a recently established unit of the National Park Service, Pullman National Monument is just beginning to form its collection. At the time this document was signed the Monument had completed the first accession in the collection; Archeological materials which were generated during archeological monitoring of the demolition phase of the Administration Building rehabilitation. The objects are stored at the Midwest Archeological Center. The Monument was also in the process of completing its second accession for the collection, which included an object from the Pullman Exhibit at the 1933 Chicago World's Fair, A Century of Progress Exhibition, which was donated by a recently retired NPS staff member's family.

The Monument's museum collection will consist of cultural collections. There is no expectation at this time for the Monument to acquire natural history collections.

The cultural collections will consist of archeological materials systematically excavated from within the Monument's boundaries and associated field records; historic objects associated with the Pullman Company and the labor history movement of the late 19th and early 20th centuries; archival and manuscript collections such as oral histories, photographs, and resource management records; and art objects that could be acquired donations.

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I. INTRODUCTION

A. National Park Service Museum Collections

The Department of Interior defines a museum collection as a subset of personal property that is retained for long-term preservation, study, and interpretation consistent with statutory requirements and its relationship to the mission of the respective bureau and park. The National Park Service (NPS) affirmed its mandate to actively acquire and preserve objects, specimens, and archives in *NPS Management Policies* (2006, section 5.3.5.5), stating that, “The Service will collect, protect, preserve, provide access to, and use objects, specimens, and archival and manuscript collections ... in the disciplines of archeology, ethnography, history, biology, geology, and paleontology to aid understanding among park visitors, and to advance knowledge in the humanities and sciences.”

Parks acquire and manage museum collections because they are:

“important park resources in their own right as well as being valuable for the information they provide about processes, events, and interactions among people and the environment. Natural and cultural objects and their associated records provide baseline data, serving as scientific and historical documentation of the park’s resources and purpose. All resource management records that are directly associated with museum objects are managed as museum property. These and other resource management records are preserved as part of the archival and manuscript collection because they document and provide an information base for the continuing management of the park’s resources.” (NPS-28 *Cultural Resource Management Guideline*, 1998: 137)

Because of their significance, *NPS Management Policies* (2006, section 1.4.6) includes museum collections among the park resources and values which are subject to the no-impairment standard.

B. Purpose of Scope of Collections Statement

A Scope of Collection Statement (SOCS) is a stand-alone document that states the significance of the museum collection and sets limits on it based on the park’s purpose and interpretive objectives as enunciated in legislation, other mandates, and park-specific planning documents (NPS-28, *Cultural Resource Management Guideline*, Chapter 9). Preparation of a Scope of Collection Statement is required by *NPS Management Policies* (2006, Chapter 5), Director’s Order-24 (*Museum Collection Management*) and Director’s Order-28 (*Cultural Resource Management*).

This SOCS defines the scope of present and future museum collection holdings of Pullman National Monument that contribute directly to the understanding and interpretation of the Monument’s purpose(s), themes, and resources, as well as those objects that the NPS is legally mandated to preserve. It is designed to ensure that the entirety of the museum collection is clearly relevant to the site; it serves to prevent arbitrary, unnecessary, and excessive growth of the museum collection while preserving the unique values associated with the Monument.

A Collections Advisory Committee (CAC) has been required since 2000 to review certain deaccessions. The CAC reviews deaccessions for outside the SOCS (transfer to other federal agency outside DOI, conveyance to private institution or non-government entity, and exchange outside DOI), voluntary destruction or abandonment, and non-museum property accessioned in error; and makes recommendations to the superintendent.

And a CAC has been required since 2017 to review potential non-mandated acquisitions for fitting within this SOCS. The CAC reviews potential new acquisitions that are non-mandated (gift, purchase, transfer, exchange, and loan [incoming and outgoing]) and makes recommendations to the superintendent. The only acquisitions exempt from committee review are field collections. A CAC is also required to review the consumptive use of museum collections.

The Monument has established a CAC and is updated when needed as staffing changes.

C. Legislation Related to Museum Collections

The NPS's legal mandate for acquiring and preserving museum collections is contained in the:

- Antiquities Act of 1906 (54 USC 320301-320303)
- National Park Service Organic Act of 1916 (54 USC 100101 (a), 100301 *et seq.*)
- Historic Sites, Buildings, and Antiquities Act of 1935 (54 USC 320101 *et seq.*)
- Management of Museum Properties Act of 1955, as amended (54 USC 102501-102504)
- Reservoir Salvage Act of 1960, as amended (15 USC 469-469c-2)
- National Historic Preservation Act of 1966, as amended (54 USC 300101 *et seq.*)
- Archaeological and Historic Preservation Act of 1974, as amended (54 USC 312501-312508)
- Archaeological Resources Protection Act of 1979, as amended (16 USC 470aa-mm)
- National Parks Omnibus Management Act of 1998 (54 USC 100701 *et seq.*).

For a more detailed description of legislation and regulations as related to NPS museum collection, see NPS *Museum Handbook*, Part I, Appendix A: Mandates and Standards for NPS Museum Collections.

II. CONTEXT FOR PULLMAN NATIONAL MONUMENT COLLECTION

A. History of Pullman National Monument

From the 2017 Foundation Document - Located in the Pullman District of south Chicago, Illinois, the Pullman National Monument boundary includes much of the historic Pullman neighborhood, which was designed as a model factory town in the late 19th century and is a thriving community today.

There are several places for visitors to experience Pullman history and resources, including the Historic Pullman Foundation Visitor Information Center, Pullman State Historic Site at the Hotel Florence, the National A. Philip Randolph Pullman Porter Museum, and the Pullman neighborhood itself. The National Park Service does not own or manage these places. There are several overlapping designations and authorities in the Pullman neighborhood.

Pullman National Monument commemorates a complex history of individual and community struggles in an industrial age that still resonates today. The Monument is part of an architectural innovation that is considered the first planned industrial community in the United States. The production of sleeping and other luxury railcars, or "the hotel on wheels", made the Town of Pullman a site of industrial achievements for the railroad industry, while the design of the planned community, with its working class residents, drew global attention for its social landscape in the late 19th and early 20th centuries. The Pullman Palace Car Company (Pullman Company), Pullman District, and the working community of Pullman gained further notoriety as the site of some of the largest labor actions in American history—first with the Pullman Strike of 1894, and later when the Brotherhood of Sleeping Car Porters was recognized as the first African American Union by the American Federation of Labor and the Pullman Company in 1937.

George Pullman arrived in Chicago in 1859, gaining fame by designing a complex system of jacks that helped raise the level of city buildings for the installation of a new sewer system meant to prevent flooding in the city.¹ At around the same time, Pullman began designing luxury train cars to ease cross-country travel.²

In early 1880, Pullman purchased 4,000 acres of land south of Chicago on which to build his railcar factory and a residential town for his employees.³ Pullman was aware of the ever increasing poor living conditions brought on by the industrial revolution, and sought a solution in this planned industrial community, arguably the first of its kind in American history.⁴ Architect Solon Spencer Beman and landscape architect Nathan F. Barrett were

¹ "George Mortimer Pullman," The Pullman State Historic Site, last modified August, 2011, accessed June 29, 2015, <http://www.pullman-museum.org/theMan/>.

² Ibid.

³ "The Town of Pullman," The Pullman State Historic Site, last modified August, 2011, accessed June 30, 2015, <http://www.pullman-museum.org/theTown/>.

⁴ Daily Comp. Pres. Docs., 2015 DCPD No. 00109, pg 1.

commissioned by Pullman to design a cost-effective, yet aesthetically pleasing community. Each house was unique with variable decorative architectural features and interior layouts to accommodate the different levels of income, status, and family size. Beman's variations in the façade and rooflines broke up the monotony of the practical row houses. Barrett's landscape designs were just as significant to developing desirable living conditions. Resembling a suburban park, each row house had its own front yard. Thirty thousand trees lined the streets and parks of Pullman, with public grounds maintained by the Pullman Company.⁵

Pullman's model factory town solution gained recognition around the world and drew crowds during the 1893 World's Fair. However, the strict management of the properties by the Pullman Company through the worst economic depression in American history prior to the Great Depression caused significant stress on the workers and families of Pullman. Orders at the factory declined and the Pullman Company cut workers' wages. However, it did not adjust the rent for housing. This sparked the Pullman Strike of 1894, an event that became one of America's largest labor actions, paralyzing the railroads, and threatening the national economy.

Negotiations of declining wages failed between the workers and the company, and an appeal from the American Railway Union (ARU) failed to gain any ground for the workers at the Pullman Company. In response, the ARU members refused to work trains that included Pullman cars beginning on June 26, 1894.⁶ The intervention of federal troops eventually broke the strike and work continued. However, public sentiment towards the Pullman Company's business practices had fallen. The company was accused of being un-American in their treatment of workers. Their management of the properties and the workers' wages was viewed as an example of overbearing paternalism. The Illinois State Supreme Court sued the Pullman Company for violating mercantile rights and ordered it to relinquish its real estate. In 1898, the town of Pullman was annexed into the City of Chicago, and workers were able to purchase the homes in which they lived.⁷

The Pullman Company's impact on labor history continued beyond the Strike of 1894. By 1920, it was the second largest employer of African-Americans in the United States.⁸ Porters and maids had to work 400 hours per month or 11,000 miles to earn full pay.⁹ Hospitality workers were dependent upon the whims of white passengers and their tips to support their families. In 1925, frustrated with their limitations and their treatment by the Pullman Company, Pullman Porters in New York City appealed to A. Philip Randolph to help

⁵ The Pullman State Historic Site, "The Town of Pullman."

⁶ Smith, Carl, "Pullman Strike," in *The Encyclopedia of Chicago*, eds. James R. Grossman, Ann Durkin Keating, and Janice L. Reiff (Chicago: The University of Chicago Press, 2004), 666.

⁷ Reiff, Janice, "Pullman," in *The Encyclopedia of Chicago*, eds. James R. Grossman, Ann Durkin Keating, and Janice L. Reiff (Chicago: The University of Chicago Press, 2004), 665.

⁸ "Labor and Race Relations," The Pullman State Historic Site, last modified August, 2011, accessed June 30, 2015, <http://www.pullman-museum.org/laborAndRace/>

⁹ "The Evolution and History of the Union," National A. Philip Randolph Pullman Porter Museum, last modified 2013, accessed June 30, 2015, http://www.aphiliprandolphmuseum.com/evo_history4.html

organize the Brotherhood of Sleeping Car Porters (BSCP).¹⁰ However, segregation within labor unions was still in effect, and the American Federation of Labor and the Pullman Company did not recognize or negotiate with the BSCP until 1937, when the union won a collective bargaining agreement with the Pullman Company.¹¹ This contract marked a milestone in African-American independence from racist corporate paternalism and contributed to the rise of the civil rights movement in the United States.¹²

By the 1960s, it was recommended that Pullman be demolished to make way for industrial expansion. However, the residents of Pullman disagreed and organized to fight the proposed demolition. They reinstated the Pullman Civic Organization to clean up the neighborhood and prove that it was worth keeping. To further protect their community, the Historic Pullman Foundation was created to promote and preserve the rich history of Pullman.¹³

The Pullman Historic District was designated a National Historic Landmark on December 30th, 1970, establishing national significance based on its importance in social history, architecture, and urban planning.¹⁴ These multi-layered stories of industry, labor, race, and society maintain a relevant narrative today.

On February 19, 2015, by Presidential Proclamation, President Barack Obama established Pullman National Monument.

B. Enabling Legislation, Purpose, and Significance

Pullman National Monument was established on February 19, 2015, by Presidential Proclamation of President Barack Obama, to preserve...

“...the historic resources; to interpret the industrial history and labor struggles and achievements associated with the Pullman Company, including the rise and role of the Brotherhood of Sleeping Car Porters; and to interpret the history of urban planning and design of which the planned company town of Pullman is a nationally significant example.”¹⁵

From the 2017 Foundation Document – Pullman National Monument fulfills the following purposes for the benefit of present and future generations: to preserve the historic resources; to interpret the industrial history and labor struggles and achievements associated with the Pullman Company, including the rise of and the role of the Brotherhood of Sleeping Car

¹⁰ Wormser, Richard, “Jim Crow Stories: Brotherhood of Sleeping Car Porters,” Public Broadcasting Station, last modified 2002, accessed June 30, 2015, http://www.pbs.org/wnet/jimcrow/stories_org_brother.html.

¹¹ “Pullman & the African-American Experience,” The Pullman State Historic Site, last modified August, 2011, accessed June 30, 2015, <http://www.pullman-museum.org/laborAndRace/raceRelations.html>.

¹² Daily Comp. Pres. Docs., 2015 DCPD No. 00109, pg. 2.

¹³ Ibid, 666.

¹⁴ “Pullman Historic District,” National Register of Historic Landmarks Program, accessed June 30, 2015, <http://tps.cr.nps.gov/nhl/detail.cfm?ResourceId=817&ResourceType=>.

¹⁵ Daily Comp. Pres. Docs., 2015 DCPD No. 00109, pg. 4

Porters; and to interpret the history of urban planning and design of which the planned company town of Pullman is a nationally significant example.

The following significance statements have been identified for Pullman National Monument.

1. The Pullman Company transformed passenger rail travel in America. The comfortable facilities and consistently exceptional level of service of the Pullman Company was unprecedented; it became an international model for luxury. Pullman was a brand name equated with opulence and consistency and is still recognized worldwide.
2. The Pullman neighborhood was the first completely planned major industrial model community in America. The community was recognized by some as “the perfect town,” and influenced later-planned communities. The architecture by Solon Spencer Beman, landscape architecture by Nathan Franklin Barrett, and sanitation by Benezette Williams, were thoughtfully designed to provide good living conditions for workers, a significant departure from previous worker housing models and an improvement on what was generally available to workers in the free market in American cities at the time.
3. George Pullman’s factory town is a powerful example of the concept of corporate paternalism. Amenities provided to employees to encourage loyalty and workforce retention were meant to be both good for workers and profitable for the company. The Pullman workers’ experiences were a mix of benefits and limitations. Employees in the community, comprised of European immigrants and migrants from the South and other parts of America, had to conform to the company’s expectations. The Pullman Company town influenced later similar efforts by other industrialists.
4. The Pullman Company and its employees played a pivotal role in the American labor movement. The 1894 strike was national in scope and highlighted the emerging strength of unions in America. Clarence Darrow and Eugene V. Debs, major figures in U.S. labor history, played roles in the Pullman strike. President Cleveland used the Sherman Anti-Trust Act to end the strike, the first time it was ever used against a union. Though already adopted by nearly half of the states, the enactment of the national Labor Day holiday was spurred by the Pullman Strike.
5. The Pullman porter job was pivotal for the growth of the black middle class in America, and porters played a large role in the civil rights movement. By 1937 the Pullman Company had been the nation’s largest employer of African Americans for more than 20 years, and Pullman porters composed 44% of the Pullman Company workforce. The jobs at Pullman contributed to the Great Migration of African Americans.
6. Formed by A. Philip Randolph, the Brotherhood of Sleeping Car Porters (BSCP) was the first black union to be recognized by the American Federation of Labor and to achieve a bargaining agreement with a major corporation. The BSCP union had a major influence on the American civil rights movement. The Pullman neighborhood is home to the National A. Phillip Randolph Pullman Porter Museum.

7. The business economy of Pullman's industries allowed the company to be successful for a long period, despite legal and labor challenges. The Pullman Company was vertically integrated for maximum profit. It controlled the manufacturing process and staffing for its products and services. It leased its products and tightly controlled the consistency of the experience it provided.

C. Resource Management Objectives

The following fundamental resources and values have been identified for Pullman National Monument in the 2017 Foundation Document.

- *Administration Clock Tower Building.* This structure is the cornerstone of the National Park Service presence at the Monument. The Administration Clock Tower Building was the heart of the factory and town. An arson fire in 1998 heavily damaged the building, following which it was partially reconstructed and restored. The National Park Service currently owns only the Administration Clock Tower Building, and the Illinois Historic Preservation Agency owns the grounds and the rest of the Pullman Factory site.
- *Partnerships with Community Organizations.* With limited NPS ownership, cooperative partnerships with existing and future organized groups and government agencies are fundamental to telling the Pullman story and preserving related resources. The presidential proclamation directs the National Park Service "to use applicable authorities to seek to enter into agreements with others to address common interests and promote management efficiencies, including provision of visitor services, interpretation and education, establishment and care of museum collections, and preservation of historic objects."

In addition, the following Related Resources have been identified for the Monument. Issues to be addressed in planning and management as well as Operational Needs and opportunities for each of the below resources are defined in the 2017 Foundation Document.

- Historic Designed Landscape of the Pullman Factory and Neighborhood
- Pullman Factory Site and the Hotel Florence
- Private Properties within the Monument boundary
- Public Spaces and Services within the Monument boundary
- The Pullman Community
- Pullman Stories
- Collections

D. Interpretive Themes

From the 2017 Foundation Document - The following interpretive themes have been identified for Pullman National Monument.

1. The Pullman Palace Car Company revolutionized rail travel through the innovative design, construction, marketing, and operation of Pullman passenger cars. The word “Pullman” became synonymous with standards for luxury, comfort, and service – ideas that nationally impacted the railroad industry.
2. Industrialist George Pullman’s vision of an integrated manufacturing complex and residential community that was pleasant, efficient, and profitable was a late 19th century experiment in social and economic planning. Heralded by some as brilliant, and others as oppressive, this experiment still influences urban planners today.
3. The Pullman Company and town of Pullman in 1894 were at a critical nexus of U.S. labor history that explored relationships between capital, organized labor, and government in the midst of economic recession.
4. The African American Pullman porters found employment opportunity with the Pullman Company after the Civil War, along with societal limitations. During the 1920s, the porters formed an alliance with A. Philip Randolph that eventually led to the Brotherhood of Sleeping Car Porters becoming the first black labor union chartered by the American Federation of Labor in 1937. This group also influenced the 1960s civil rights movement.

E. Structures, Landmarks, and Other Park Resources listed on National or International Lists

The Pullman Historic District is listed on the National Register of Historic Places. There is a National Historic Landmark District boundary overlaying the Monument.

III. TYPES OF COLLECTIONS

An overall objective of the Monument’s museum management program and the museum collection is to support management goals and objectives. The Monument’s significance statements, interpretive themes and resource management objectives mentioned in the previous section provide direction for the acquisition of museum objects and directly inform the following collecting guidelines. Adherence to the guidelines will prevent arbitrary and excessive growth of the collection, while ensuring that it remains relevant to the Monument’s mission.

The museum collection is divided into two major categories: the cultural collection and the natural history collection. Both types of collections support research, resource management and education; provide baseline data of Monument resources; document changes that resources are undergoing because of internal Monument conditions and external effects; and provide for the protection of important objects and species whose *in-situ* preservation cannot be assured. It is critical that all collections support goals associated with the Monument’s purpose.

A. Cultural Resources Collections

The broad purpose of the cultural collection is to preserve a portion of America's cultural heritage to increase knowledge and inspiration among present and future generations through exhibits, research and interpretive programs. Another important purpose is to preserve and make accessible associated records and data that document field research projects, major Monument development activities, and signature current events that are likely to become important 'historic events' in the future. Objects and archival collections with a direct association to the Monument are more desirable for inclusion within the collection than similar items without such primary significance.

Future growth of the collection should enhance the understanding of and promote the stewardship of the Monument's cultural resources. Growth should be guided by:

- Current and future Monument planning documents, including the Foundation Document (2017), Historic Resource Study (2019), and Exhibit Plan (2020).
- Cultural resources baselines/inventorying and monitoring activities.
- Regulatory and compliance activities such as those mandated by the National Historical Preservation Act of 1966, as amended and the Archaeological Resources Protection Act of 1979 (ARPA).
- Research proposals and/or work plans that include collection of cultural material must provide funding for cataloging and initial preservation and storage of the specimens and records as line item budget and must identify the parties responsible for this curation. Uncontrolled, casual collecting of cultural material by visitors or Monument staff is strongly discouraged.

The cultural collection is subdivided into five disciplines: archeology, ethnology, history, art, and archival and manuscript collections. As a recently established unit of the National Park Service (NPS), the Monument is just beginning to form its collection. At the time this document was signed the Monument had completed the first accession; Archeological materials which were generated during archeological monitoring of the demolition phase of the Administration Building rehabilitation. The objects are stored at the Midwest Archeological Center. The Monument was also in the process of completing its second accession, which included an object from the Pullman Exhibit at the 1933 Chicago World's Fair, A Century of Progress Exhibition, which was donated by a recently retired NPS staff member's family. The Monument intends to collect in the disciplines of history, art, and archival and manuscript collections. Since the extent of Federal property is limited to the Administration building, which has recently undergone major rehabilitation, the expected growth of the archeological collection is extremely limited given the very few areas for conducting archeological investigations.

The following list generally identifies, by discipline, object types appropriate to the Monument's museum collection and generally describes current representation.

1. Archeology Collection

Archaeological collections are generated in response to cultural resource management requirements related to legal mandates, to development of Monument facilities, to preservation-related activities, and to research requirements. The regulation 36 CFR 79.4 defines an archeological collection as “material remains that are excavated or removed during a survey, excavation or other study of a prehistoric or historic resource, and associated records that are prepared or assembled in connection with the survey, excavation or other study.” It further defines material remains as “artifacts, objects, specimens and other physical evidence that are excavated or removed in connection with efforts to locate, evaluate, document, study, preserve or recover a prehistoric or historic resource.”

The regulation 36 CFR 79.4 defines records associated with archeological resources (associated records) as “original records (or copies thereof) that are prepared, assembled and document efforts to locate, evaluate, record, study, preserve or recover a prehistoric or historic resource.” For archeological projects, records will be generated even if material remains are not collected (see Section II.A.5. Archival Collection below for more information about what constitutes an archeological record).

Staff and visitors of NPS sites should not pick up artifacts. Surface artifacts should be left in place; collecting them removes them from their archeological provenience, degrades sites, and can reduce our understanding of the artifacts and their contexts. If archeological materials are collected outside the parameters of an authorized archeological study and brought to Monument staff, appropriate measures must be taken to ensure that the visitor or staff member collects no more material. Further, it is critical that precise provenience information is recorded, as possible, that Monument cultural resource staff is notified, and that the objects/data are promptly given to the curatorial staff upon receipt by staff members. The Monument should develop appropriate interpretive messages and staff training to prevent this unauthorized collection of materials. Archaeological Resources Protections Act (ARPA) violations should be promptly reported to park law enforcement officers.

Archeological Research Design & Museum Collection Acquisition

The NPS *Management Policies* (2006, section 5.3.5.1) mandates that archeological resources are managed in situ, unless the removal of artifacts or physical disturbance is justified by research, consultation, preservation, protection, or interpretive requirements. “Data recovery actions will be taken only in the context of planning, consultation, and appropriate decision-making . . . conducted within the scope of an approved research design.”

Research design, collecting strategy, and sampling strategy are all vital components of an archeological investigation. These documents should be detailed and approved before archeological permits are accepted and/or archeological materials are acquired by the Monument. Specific considerations should be made regarding long-term needs of the material required, collections care, future research interest and potential, and concerns of culturally affiliated groups. The collecting strategy, developed before the project begins and implemented during and after the project, has direct implications for the materials curated in the Monument’s archeological collection. It is vital that the park’s Acting Cultural Resource Specialist and the

Monument's MWAC Archeologist reviews proposed research designs before ARPA permits are issued or NPS staff implement compliance or research projects. Legislative and other guidance for archeological research can be found at NPS Management Policies 2006, sections 5.1, 5.3.5.1.5, and 5.3.5.3.3; NPS Archeology Program/Federal Archeology Program/Permitting website; NPS-28: Cultural Resources Management Guideline, Section D.2; NPS Museum Handbook Part III: Collections Use.

Current Archaeology Collection

As of Fiscal Year 2020, there were 7 artifacts and 29 archival documents in the Monument's archaeology collection. These materials were generated during archeological monitoring of the demolition phase of the Administration Building rehabilitation as required under Section 106 of NHPA and ARPA. The items consist of a 1x1 meter sample of wood flooring that is likely original fragments and two bottles collected from sealed archeological contexts. The floor was noted as potentially original fabric by the Illinois SHPO and a sample was collected to mitigate any potential adverse effects to the Monument.

Since the extent of Federal property is limited to the Administration building, which has recently undergone major rehabilitation, the expected growth of the archeological collection is extremely limited given the very few areas for conducting archeological investigations.

Archaeology Collections Growth

➤ Must Be Acquired (Mandated)

As stated in 43 CFR Part 7, any systematically collected archaeological materials discovered within the park (except inalienable and communal property, as defined by NAGPRA) are the property of the United States. The acquisition of additional material should occur as necessitated by resource management and other park needs, consistent with these special land and resource ownership agreements. The NPS *Management Policies* (2006, section 5.3.5.1) mandate that archaeological artifacts, specimens, and associated records will be maintained together in the park museum collection.

Collections (artifacts and/or associated records) may result from research or compliance projects, including as a result of historical research, surveys (phase I), test excavations (phase II), and research or mitigative excavations (phase III). Every archeology project will result in materials for the museum collection; even if artifacts are not collected, project records must be accessioned and cataloged into the collection.

Associated Records: All records associated with archaeological collection must be retained as part of the museum collection. These include, but are not limited to field notes, catalogs, photo logs, profiles, drawings, maps, negatives, prints, digital photos, raw data sheets, collection inventories, conservation treatments, site forms, and computer documentation and data.

At this time, collection of archeological artifacts is not a priority for the Monument. Any such artifacts will belong to those collections which are mandated by law to maintain. If an archeological survey of the Monument's property is conducted, any artifacts recovered from the survey will become part of the museum collection. All

archeological collections along with associated project documents will be stored at the Midwest Archeological Center (MWAC) in Lincoln, Nebraska, for long-term preservation.

➤ **Should Be Acquired**

Surface or diagnostic finds not recovered from systematic excavations, but which have provenience data and are uncommon in the collection and/or suitable for exhibit should be acquired.

Significant surface finds should be accessioned and cataloged into the collection and catalog data should include all pertinent data. Surface finds of questionable significance may be placed in a reference collection and not included as museum property until such time that a professional archeologist can determine that the artifact(s) has archeological value. At that time, the artifacts should be included in the museum collection and cataloged with all pertinent data.

Confiscated Archeological Objects. These are objects recovered from unauthorized and illegal activities. They might include unearthed artifacts and ecofacts illegally excavated or uncontrolled surface collecting by unauthorized individuals within the Monument boundaries. Such materials might be held temporarily as evidence if legal action is to be taken but should be formally turned over to the museum curator as soon as possible. The curatorial staff of MWAC should be contacted to ensure proper handling and transportation of these materials. Such objects might be turned over to MWAC as soon as possible. Once all legal questions are resolved, the objects and all associated documentation should be added to the museum collection.

Native American human remains and associated funerary objects, plus other NAGPRA objects, recovered from unauthorized and illegal activities are to be treated as inadvertent discoveries under NAGPRA and not added to the museum collection. The Regional NAGPRA Coordinator should be contacted for regulatory requirements regarding NAGPRA related items.

Due to the physical layout of the Monument's borders, the property on which most, if any, illegal activities or surface finds occur belongs to the State of Illinois, and any archeological materials found outside of the Monument's 0.2937 acres belongs to the State. If surface finds are brought to staff at the Monument, immediate documentation of the find will be recorded, the State Site authorities will be notified, and the material and associated documentation will be handed over to the State Officials.

➤ **May Be Acquired**

Collections excavated from within the Monument before it was created should be considered on a case-by-case basis considering available provenience data, record of ownership (provenance), objects present, and associated records.

Systematic archeological collections from areas outside Monument boundaries may be acquired on a highly selective case-by-case basis and must be done in consultation with

the Regional Archeology and Museum Programs. The collection must add to the understanding of the history of human habitation in the Monument, must have clear title, and not contain NAGPRA collections. Solicitor review may be required to review this type of acquisition. Such collections should not come in as loans.

The Monument's Collection Advisory Committee should consider each non-mandated acquisition with particular care. If possible, such material should be directed to partner institutions such as local historical societies and museums or universities within the state.

➤ **Not To Be Acquired**

The Monument should discourage visitors from collection cultural and natural resource materials from ground surfaces. Artifacts with no direct provenience to the Monument, artifacts which lack data, and artifacts with questionable provenance should not be accessioned into the museum collection. Native American human remains and inalienable and communal property subject to NAGPRA will not be added to the collection.

2. Ethnology Collection

According to NPS-28, Cultural Resource Management Guidelines, the ethnology classification is used for resources associated with the cultural systems or ways of life, and the related technology, sites, structures, and natural resources of peoples associated with parks. The decision to call resources "ethnographic" depends on whether associated peoples perceive them as traditionally meaningful to their identity as a group and the survival of their lifeways. A major goal of ethnological collections is to facilitate collaborative relationships between the NPS and the peoples whose customary ways of life affect and are affected by park resource management. For museum collection management purposes, the ethnology classification is used "for objects produced by or associated with Native American or other indigenous people from contemporary cultures." (NPS *Museum Handbook*, Part II, p. F:1).

If future ethnographic studies are planned, project records and materials are to be retained as part of the museum collection. Objects might also be acquired through donation, for use in exhibitions, and for cultural affiliation studies. The composition of the Monument's ethnology collection is subject to change, as traditionally associated peoples are identified, and resources are evaluated for inclusion in the Ethnographic Resource Inventory (ERI).

Current Ethnology Collection

At the time this document was signed, the collection did not include any ethnological materials (objects). There is no plan for the Monument to acquire ethnology collections as the focus of the Monument is its historical significance.

Ethnology Collection Growth

➤ **Must Be Acquired**

There are no ethnographic materials (objects) that the Monument is required by law or other mandate to preserve in the museum collection.

➤ **Should Be Acquired**

There are no upcoming projects that would result in ethnographic materials that should be considered for inclusion in the collection.

➤ **May Be Acquired**

Acquisition of ethnographic objects should focus on the ethnographic resources from the Monument and the groups who have been the traditional users of the Monument land. The Council of the Three Fires--comprised of the Ojibwe, Odawa, and Potawatomi Nations--as well as the Miami, Ho-Chunk, Menominee, Sac, Fox, Kickapoo, and Illinois Nations have cultural ties to the Chicagoland area, within which the Monument resides. This current cultural and geographic connection provides the Monument with opportunities to further engage topics related to cultural continuity and change of the indigenous people of the area. Modern examples of native material culture may be collected to illustrate such cultural change or continuity through time.

Ethnographic objects needed for exhibit should be considered on a case-by-case basis and must be included in an approved exhibit plan or historic furnishing plan. The Monument should carefully consider collections of non-original ethnographic resources which may attributed to traditionally associated people of the park/park area.

Acquisition decisions should consider if the material being acquired:

- supports interpretive program and research goals, especially where material culture, traditional and historic cultural activities, and natural resources are intertwined,
- documents methods or objects that will likely no longer be made in the near future in an effort to support the preservation of or to illustrate cultural change,
- includes examples of well documented objects that support an understanding of significant traditional activities, both daily life and ceremonial or spiritual events, by the general public.

Associated Records. All records and data associated with ethnographic projects are retained as part of the museum collection and cataloged as archival collections. These records may include field notes; interview schedules, recordings (video and audio), interview transcripts; negatives, prints and slides; data sheets (all subject to restrictions of confidentiality, if any); artifact inventories; analytical study data; computer documentation and data; reports generated by ethnographic investigations; as well as any other documents generated through ethnographic field work. For further information see the Archival Collection section of this SOCS.

➤ **Not To Be Acquired**

Ethnographic materials from peoples who do not have direct associations to the Monument. Duplicates, objects without clear title and/or restrictions, and objects that the Monument cannot care for or procure adequate storage for. Inalienable and communal property (as defined by NAGPRA), should not be collected for the Monument's collections.

3. History Collection

The NPS history collections reflect the entire spectrum of materials made and used during recorded times by humans residing in the United States. They include cultural collections that are neither archeological nor ethnological. These collections document individual or community life and social, cultural, political, economic, and technological trends and events. Some history collections reflect elite lives and activities of well-known individuals; others evidence everyday life and actions of working men and women. Documenting and interpreting historical objects to the public in the context of their original settings enhances the public's understanding of the Monument.

The history collection includes objects that represent the interpretive themes outline in the introduction and may also include important objects related to the historic activities within the Monument, and the history of the Monument itself. Priority for acquiring historical objects is given to the best-documented, site-related, or Monument-related objects. Acquisitions will be consistent with the recommendations of approved interpretive plans, exhibit plans, historic research, and other research or resource management initiatives. If unprovenanced or period objects become available, priority is given to acquiring the best-preserved examples but only when appropriate for supporting identified interpretive themes or resource and other management goals. The history collection is based on the Monument's themes used to establish the following collecting categories:

- a. *Historic Era*: Original furnishings and architectural pieces from the Pullman Administration Building. Objects used in the day-to-day operation of the factory and offices. Personal artifacts including uniforms and accessories belonging to workers on the Pullman Company site in Pullman, Pullman Porters and Maids, and Federal Troops involved in the 1894 strike; items include, but are not limited to, uniforms, clothes, safety goggles, boots, gloves, hats, belts, wallets, purses, combs, brushes, name tags and other personal ephemera. Objects used in the operation of Pullman Cars and the representation of the "Hotel on Wheels" which include, but are not limited to, tableware, table settings, menus, soap, towels, tickets, ticket punches, and uniforms as well as authenticated furnishings, fabrics and parts from Pullman trains.
- b. *Early Park Development (2015 -2020)*: Material in this category includes items representing the establishment of the Monument. T-Shirts, signs, posters, banners, flags, pins, buttons, design samples, and other objects related to Monument development.

- c. *Commemorative Events*: Memorabilia from important current or commemorative events are included in the museum collection. Notable events include but are not limited to the proclamation ceremony, groundbreaking ceremony, opening ceremony, exhibit openings, and anniversaries of the Monument. Items from these events may include pens used to sign significant documents, groundbreaking shovels, cut ribbons, scissors, banners, t-shirts, hard hats, and other notable items that play significant roles in the event. Materials from these types of important Monument activities will continue to be preserved as they become available.
- d. *Historic Fabric*: When original unique or diagnostic architectural fabric is removed from the historic structure, the Pullman Administration building, during a preservation or restoration project, a representative portion of the fabric will be preserved and accessioned into the museum collection, along with any associated documentation.
- e. *Future Collections Activity*: Future collections activity in this area will concentrate on the acquisition of outstanding examples of objects currently not represented in the collection, which meet the criteria referenced above and clearly correct an interpretive or research deficiency noted in the Monument's Foundation Document (2017), Long-Range Interpretive Plan, future exhibit plans, or other planning documents. This will ensure that the history collection is relevant to the interpretive and research needs of the Monument.

Acquisitions of these types of collections will be refined as the Monument develops. It is important to acknowledge that many partner institutions, organizations, and other NPS units maintain museum and archival collections directly related to the Pullman Palace Car Company, the Town of Pullman and the Brotherhood of Sleeping Car Porters. Those include but are not limited to: Chicago History Museum/Chicago Historical Society, Chicago Public Library, Historic Pullman Foundation, Illinois Historic Preservation Agency (IHPA), Illinois Labor History Society, Illinois Railway Museum, National A. Philip Randolph National Pullman Porter Museum, National Museum of American History, The Newberry, Pullman State Historic Site, South Suburban Genealogical and Historical Society, Steamtown National Historic Site, and Union Pacific Railroad Museum. The Monument will partner with organizations to care for and maintain artifacts of historic significance to the history of the site but will not solicit donations from partner organizations.

Current History Collection

At the time this document was signed the history collection consisted of one accession of one object. This object is from the Pullman Exhibit at the 1933 Chicago World's Fair, A Century of Progress Exhibition, which was donated by a recently retired NPS staff member's family.

History Collection Growth

➤ **Must Be Acquired**

There are no historic materials (objects) that the Monument is required by law or other mandate to preserve in the museum collection.

Associated Records. All records and data associated with Monument history studies or other projects are retained as part of the museum collection and cataloged as archival collections. These records may include field notes; interview schedules, recordings (video and audio), interview transcripts; negatives, prints and slides; analytical study data; computer documentation and data; reports generated by history research; as well as any other documents generated through efforts to document the history of the Monument. For further information see the Archival Collection section of this SOCS.

➤ **Should Be Acquired**

Unique or diagnostic architectural materials removed from historic structures in the Monument will need to be carefully evaluated and considered for preservation, reuse, or destruction. If very little of the removed material remains in situ, a representative sample or portion of the character defining elements of the fabric or building hardware will be preserved and accessioned into the museum collection, along with any associated documentation.

Memorabilia related to the establishment of the Monument or otherwise commemorating anniversary dates of the Monument's establishment should be considered for acquisition. These objects should be evaluated on a case-by-case basis, taking into consideration the availability of items, rarity, and interpretive value.

Additional photographic images documenting the people, use, structures, history, natural and cultural resources, ecosystem changes and significant events of the Monument as articulated in the themes above should be acquired as they become available. Original pre-to mid-20th century images should be a collecting priority.

➤ **May Be Acquired**

Future acquisitions must fit within the history collecting categories listed above and must prioritize objects that are in the best condition, are site-specific, and are well-documented. Although objects without good provenience, or with related provenience but not site-specific *may* be acquired to meet the Monument's planning documents, exhibits, and other research and management initiatives, it is worth exploring them as part of a separate interpretive or educational collection that is clearly marked as such and is slated for consumptive use as needed.

Period pieces acquired to fulfill exhibit or other Monument management needs should only be accessioned and cataloged into the museum collection if they are of substantial enough value to warrant their tracking as museum objects. For more information regarding reproduction and period pieces, consult the NPS *Museum Handbook*, Part II, Appendix N.

Rare books, books that are not rare, and other library materials retained for their physical properties or associated values may be acquired. Books acquired for exhibition must be included in an approved exhibit plan or a historic furnishings plan.

➤ **Not To Be Acquired**

Objects with no direct associations to the Monument's resources should not be acquired. Objects of which the Monument has multiple examples, or objects in such poor condition that they are beyond conservation should not be acquired. Potentially hazardous materials should be only be acquired on a case-by-case basis (see the Potential Hazards in Collections section of this SOCS).

Both period pieces and reproductions must be clearly documented so that they are not confused with objects original to the site. Period pieces should be cataloged on a case-by-case basis, and reproductions should not be cataloged. For more information regarding reproduction and period pieces, consult the NPS *Museum Handbook*, Part II, Appendix N.

4. Art Collection

Art collections generally consist of paintings, drawings, prints, and sculptures admired and appreciated primarily or solely for aesthetic, intellectual, or aesthetic content. Although created primarily for utilitarian or decorative purposes rather than aesthetics, the artistry and skill of many folk artists is now recognized, and folk art is sometimes considered within fine art collections. As defined here, the art collection has historical and cultural connections to the Monument may not necessarily be created for, or directly inspired by, the Monument or its resources.

Works of art for the permanent collection are chosen with care. Funds for purchasing art are not readily available, and gifts of art works are rare. Artworks should only be chosen after careful consideration by the CAC and must meet the Monument's themes/views and be in keeping with interpretations.

Evaluation criteria for this material may include age, monetary value, notoriety of the artist, quality, and the ability of the work to support Monument programs and goals, as well as the Monument's ability to care for the artwork. Works of art by well-known and accomplished artists, with subject matter depicting the cultural and natural world of the Monument, are of priority. If the artist is still alive, the Monument should attempt to get copyright for the artwork, if not already conveyed to the Monument, or, at a minimum, obtain the rights to use the work or its representation for educational purposes such as museum exhibits and NPS publications.

Current Art Collection

At the time this document was signed, the collection did not include any works of art.

Growth of Art Collection

- **Must Be Acquired:** There are no legal mandates for the acquisition of fine arts or works from Arts in the Parks programs.
- **Should Be Acquired:** Works commissioned by the NPS for specific Monument purposes, such as exhibitions, illustrations, education, or interpretation, should be acquired. Note that contracts commissioning works of art should include language transferring copyright to the NPS. Acquisitions to the museum collection should be limited to original versions, as opposed to mass-produced copies for distribution or other replicative variations intended for short term use.

All Monument-owned artwork located in public spaces, hallways, and offices that are not already accessioned and cataloged should be carefully evaluated for potential inclusion into the museum collection by the Collections Advisory Committee.

- **May Be Acquired:** Donations of art should be considered on a case-by-case basis, evaluating direct associations to the Monument (including people who have resided in the community), subject, artist, and condition. The works that are of most interest to the Monument are those by local artists who use themes from the Monument to produce paintings, drawings, or sculptures.

Visual, literary, or sonic arts inspired by the Monument and its cultural or natural resources created by professional and amateur artists of all ages. Acquisition considerations include preservation concerns for digital arts, inherently unstable materials, and risks presented by modern artistic expressions which may include foods, bodily fluids, or other hazards for people and collections. In instances of deliberately fugitive art, it may be appropriate to photograph or otherwise document the work, in agreement with the artist. If the Monument decides in the future to participate in the NPS artist residency or similar programs, determine in advance if any artwork will become part of the museum collection or if it would be managed as other (non-museum) property.

If artwork is acquired specifically for exhibition in the Monument's exhibits or historic structures, it should be identified as a need in an appropriate exhibit or historic furnishing plan.

- **Not To Be Acquired:** Art with undocumented provenance and without clear title; "office art" or reproductions (posters, prints, and similar mass-produced copies). Artwork with no direct association (past ownership, subject, or artist) to the park. Art created during Art in the Parks or Artists in Residence programs.

5. Archival Collection

Archival collections are groups of documents created by an individual or organization that are filed together as a unit. In the NPS, the archival collections include both agency records, also called park records, and manuscript or personal paper collections received through donation or

purchase. Both types of archival collections are retained permanently in the museum collections for their historical interest and to advance the NPS mission of education, management, preservation, and research.

The term “park records” refers to documents created or received by federal government employees in the course of conducting business. Park records are preserved and managed according to the Federal Records Act (FRA) and follow Service-wide Records Schedule. The museum program is responsible for preserving the subset of these records considered to be Resource Management Records in the archival collection. See the section title Resource Management Records below for further guidance on distinguishing these records.

In the NPS, manuscript or personal papers collections are most often referred to as “donated collections,” and they will be referred to as such throughout the remainder of the document. These collections commonly refer to single documents or collections of documents created by individuals, organizations or families that donated to the collection for preservation. Donated collections may also refer to groups of individual documents that were created by different persons or organizations or those assembled later from multiple sources. The NPS *Museum Handbook*, Part II, Appendix D uses the term “assembled collections” for these types of donated collections.

It is important to note that donated collections are not “park records” therefore they are not subject to the FRA, Freedom of Information Act (FOIA), or other laws governing federal record access. Further, donated collections should never be subsumed into the records created or received by government employees; they should always be maintained and cataloged as separate, individual collections.

Resource Management Records

Policy and procedures for the management of bureau records are outlined in NPS Management Policies (2006), Director's Order #11D: Records and Electronic Information Management (2012), and the Service-wide Records Schedule (2010). The NPS Museum Handbook, Part II, Appendix D: Archives and Manuscript Collections provides further instruction for managing records that are to be included in the museum collection.

The Service-wide Records Schedule (SRS) identifies permanent records which must be retained under the FRA. Per Director's Order #11D, only Resource Management Records (RMR), and particularly associated records, fall within the scope of the museum collection and should be accessioned, cataloged, and preserved in the park's collection. NPS *Management Policies* (2006, section 5.3.5.5.6) requires that “all documentation associated with natural and cultural resource studies and other resource management actions will be retained in the park's museum collection for use in managing park resources over time.”

Additionally, “records and data that are collected, created, or generated by other organizations working for the NPS under contracts, interagency agreements, cooperative agreements, or other agreement instruments with the NPS, are considered NPS records unless the contract or agreement specifically states otherwise. Originals or copies of all project documents and data generated under these agreements should be obtained and retained by the NPS office managing the project” (DO #11D, section 4.1). The records of projects addressing cultural or natural

resources issues are resource management records and will be retained in the Monument's museum collection.

Further definition of what constitutes a resource management record for a park may vary between sites. The DO#11D REIM guide was developed with the intent to emphasize the resource management responsibilities of the NPS and the mission-critical nature of the records created in the course of NPS's resource stewardship activities. The REIM Guide lists the following questions to use to determine whether an item is a resource management record:

- Is the subject matter related to a resource or topic identified in the planning or scoping documents of the unit, such as the enabling legislation, general management plan, statement for management, resource management plan, scope of collections statement, etc.?
- Does it document NPS policies, decisions, acquisition, studies, conditions, observations, protection, monitoring, preservation, activities, transactions and management or maintenance of resources?
- Are these records used in the ongoing management of the resource? Do they provide institutional memory regarding the resource or establish baseline data?

Current Archival and Manuscript Collection

At the time this document was signed, the archival and manuscript collection consisted of 29 archival documents/associated field records relating to items in the archaeology collection.

Growth of Archival and Manuscript Collection

- **Must Be Acquired:** The types of archives described below must be acquired. In addition, consult the NPS DO #11D and the SRS for specific types of permanent records and their dispositions.
 - Associated records for archeological collections and projects
 - Historic structure documentation
 - Associated records for biological collections and projects
 - Associated records for geology collections and projects
 - Associated records for paleontology collections and projects
- **Should Be Acquired:** In some cases, materials that are not RMR and that are listed on the temporary retention schedule may have permanent importance in terms of the information they provide about the history, development, and administration of the National Parks. Such materials should be considered for permanent retention on a case-by-case basis.

Material related to early history of the area and of the Monument, of important business and personalities, and of historic events that can be acquired with release of copyright and privacy rights should be acquired. Oral histories are a valuable resource, especially when documenting the stories of associated indigenous and local communities. Note that

copyright restrictions and NPS use rights must be documented with the acquisition of audiovisual materials.

Materials directly related to Pullman Company operations, community organizations and labor history related to labor history in the late 19th and early 20th centuries including the development of the Brotherhood of Sleeping Car Porters should be acquired. The archives collection is based on the Monument's themes used to establish the following collecting categories:

- a. *Historic Era*: Manuscripts, correspondence, journals, business records, seals, ledgers, maps, blueprints, photographs, glass plate negatives, other forms of photo documentation and ephemera of individuals and groups directly related to the Pullman Company during from 1880 through 1970, particularly those events leading up to and created during events impacting U.S. labor history, including the development of the Brotherhood of Sleeping Car Porters. Acquisitions of these types of collections will be refined as the Monument develops.
- b. *Administrative History*: Material in this category includes items produced by the Monument, and materials representing the establishment of the Monument. Examples include the 2015 Presidential proclamation, still images and film documentation of the Monument site that reflects its development. Materials documenting the early history of the Monument since its establishment in 2015 and continuing through its early years as it serves visitors to the site. Documents connected with master or general management planning; GIS; land acquisition; development of administrative and visitor facilities; natural resource management; cultural resource management; partnerships; interpretation; recreational and other public use; new or amendatory Monument legislation.
- c. *Commemorative Events*: Memorabilia from important current or commemorative events are included in the museum collection. Materials of this type may include, but are not limited to artistic designs, program planning, significant documents, photographs, audio/visual recordings, publications of events, and ephemera. Materials from these types of important Monument activities will continue to be preserved as they become available.
- d. *Future Collections Activity*: Future collections activity in this area will concentrate on the acquisition of outstanding examples of materials currently not represented in the collection which meet the criteria referenced above and clearly correct an interpretive or research deficiency noted in the Monument's Foundation Document (2017), Long-Range Interpretive Plan, future exhibit plans, or other planning documents. This will ensure that the archive collection is relevant to the interpretive and research needs of the Monument.

Acquisitions of these types of collections will be refined as the Monument develops. The archives may include historic documents, administrative history, and resource management records.

Historic documents may include materials relating to George Pullman; Pullman Company; the “Model” company town; Labor History as it relates to the Pullman Strike of 1894; labor leader Eugene Debs and the Company’s labor relations after the strike; labor leader A. Philip Randolph, with a significant focus on the African-American railroad employee. Examples may include photographs depicting the Pullman company site and town in its original appearance, images of 1894 strike, and other milestone events in the Town of Pullman.

Administrative history materials documenting the establishment and development of the site as a unit of the NPS may include approved management plans, appraisals and related land acquisition records, and documentation of preservation, restoration, rehabilitation, and maintenance of the structures and grounds.

Resource management records include documentation made or acquired by a park to record information of cultural resources.

- **May Be Acquired:** Acquisition of donated photographic materials should be analyzed individually, considering available documentation, duplication of images or themes already in the historic photo collections, condition, and legal issues such as copyright. Any images documenting or depicting structures, landscapes, historic furnishings, or non-extant resources that have been lost are high priorities for research. Other appropriate themes include recreational use of the Monument (before and after Monument establishment), visiting dignitaries and traditionally associated people, and images that document Monument wildlife and natural conditions.
- **Not To Be Acquired:** Published library materials should not be acquired unless they are historic furnishings. Photocopies or microfilm of manuscript material in private collections or at other museum and archives is more appropriate as “vertical files” for research rather than for permanent preservation in the Monument’s museum collection, unless it is part of a larger documentation project. Documents for which the Monument or the NPS more generally is not the responsible office of record should not be acquired.

B. Natural History Collections

At this time, it is not the intention of the Monument to compile a natural history collection. Any future collecting of natural history specimens and records will be to support scientific research, resource management and education; provide baseline data of the Monument’s natural resources; document changes these resources are undergoing because of internal Monument conditions and external effects; preserve important or locally significant species collected in response to specific research or interpretive needs; and to guarantee the protection of important paleontological specimens whose in-situ preservation cannot be assured.

Acquisitions and future growth of the Monument's natural history collection will be through authorized scholarly research and selective acquisition. The categories of biology, geology, and paleontology will be developed and added to this document in the future as needed.

IV. PARK MUSEUM COLLECTIONS SUBJECT TO THE NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT OF 1990 (NAGPRA)

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, 25 USC 3001-13, requires, in addition to other actions, a written summary of unassociated funerary objects, sacred objects, and objects of cultural patrimony. Additionally, NAGPRA requires a written, item-level inventory of human remains and associated funerary objects to be completed no later than November 16, 1995.

As of writing, the Monument's collection does not hold human remains, nor any other objects that fall under NAGPRA.

V. ACQUISITIONS

A. Acquiring Museum Collections

Pullman National Monument continues to acquire objects that relate to the site through donation, purchase, exchange, transfer, field collection, and loan. Acquisition of museum objects is governed by the Monument's ability to manage and preserve materials according to *NPS Management Policies, Chapter 5* (2006), the standards for managing museum objects in *Director's Order #28: Cultural Resources Management Guideline* (1998); *Special Directive 80-1 Guidance for Meeting NPS Preservation and Protection Standards for Museum Collections* (1990); and the *NPS Museum Handbook I-II* (1998-2006). In accordance with NPS policy, the site does not accept donations with restrictions. The Monument can make exceptions in extreme circumstances, but that must be justified outside this SOCS and in consultation with the Regional Museum Program.

Oftentimes the best storage and preservation that the Monument can provide is to place objects on loan to another repository, such as *the NPS Independence Multi-park Facility (IMPF)* or *the Midwest Archeological Center (MWAC)*. Objects on loan remain part of the Monument's museum collection and the Monument retains responsibility to ensure that all appropriate conservation and curation techniques are followed.

Museum objects must be acquired, accessioned, and cataloged in accordance with the *NPS Museum Handbook, Part II* (2000). The NPS standards for managing, use, and disposal of museum objects are outlined in the *NPS Museum Handbook Parts I and II*, and *DO #28, Cultural Resources Management*.

Scope of Collection Statement

The Monument will acquire copyright to all incoming accessions. These must be clearly stated on the Deed of Gift. Incoming loans are not encouraged and will be acquired only for a particular purpose (e.g. research or exhibition), and for a specified period of time.

The Monument will not be a partner to, or encourage in any way, the trafficking in illicitly collected materials. All acquisitions must be collected, exported, imported, transferred, or otherwise obtained and possessed in full compliance with the laws and regulations of the country of origin, the United States federal government (including NAGPRA), and the individual states of the United States. Donors, sellers and other sources of material must be able to demonstrate legal title to the material.

All potential non-mandated collections must first be reviewed by the Collections Advisory Committee (CAC) established for the Monument. The CAC is composed of impartial and disinterested individuals providing for checks and balances to protect the superintendent and Monument staff from possible accusations of partiality, self-dealing, or vested interest. All members of the CAC are required to be federal employees. Once reviewed, the CAC will submit their reports to the Superintendent to approve or deny acquisition.

The Superintendent, by delegation, represents the Director of the National Park Service and the Secretary of the Interior in accepting title to, and responsibility for, all museum objects. The Superintendent bears the ultimate responsibility for the acquisition, proper care, and management of the site's museum collection. The Superintendent has delegated the day-to-day care of the collection to the custodial officer for museum collections. This designation must be made in writing.

All permanent acquisitions must receive formal approval from the Superintendent before they can be accepted into the museum collection. Before physical receipt of the acquisition, all paperwork including Deed of Gift must be signed by both the Monument and the donor. Upon receipt, all acquired objects and related documentation must be submitted to the Monument's Museum Curator, who prepares for the Superintendent's signature, all instruments of conveyance, and letters of thanks, acceptance or rejection, and transmits these, as appropriate, to the donor, lender, or other source of acquisition. The Superintendent, as the accountable officer, must also approve all incoming loans which are not permanent acquisitions and is the final signatory for such documentation.

B. Cataloging and Preservation of Acquired Collections

Director's Order #24 (section 4.3.16) requires superintendents to ensure that all project budgets include funding for the initial management of collections that are project generated. Initial collections management is defined as "cataloging; labeling; conservation examination and treatment (including specimen preparation); housing and storage of objects and specimens; and organization and storage of project documentation, including appraisal, arrangement, description, finding aid production, and appropriate archival housing."

The NPS *Management Policies* (2006, section 5.3.5.5.4) specifies that “Archeological, cultural landscape, ethnographic, historic and prehistoric structure, historic furnishings, natural resource, and other projects that generate collections for parks will provide for cataloging and initial preservation of those collections in the project budget.”

VI. USES AND RESTRICTIONS OF MUSEUM COLLECTIONS

A. General Use

The Monument’s museum collections may be used for exhibits, interpretive programs, research, and other interpretive media such as publications. The governing consideration on the use of museum objects is the conservation of each object in question and of the Monument’s collection as a whole:

- All exhibits or displays containing museum objects must have proper security and appropriate environmental controls to ensure their long-term preservation.
- Objects will be available for research purposes consistent with the preservation of the collection, subject to the guidelines outlined in *Director’s Order #28* (1998) and *Director’s Order #24* (2008).
- No use of the museum collection will be permitted without a curatorial staff member present. Prior arrangements must be made to examine museum collection materials. Non-NPS researchers who wish to use the collection must complete an application form, which will be reviewed by Monument’s curatorial staff. If applicable, the research proposal may be presented for review during consultation with all local and/or affiliated American Indian tribes before access to certain items in the collection is granted.
- Museum objects will not be used in living history demonstrations. Exhibits may be incorporated into programs through organized tours or other non-consumptive techniques.
- Any interpretive use that can be defined as consumptive must be authorized in advance, as outlined in Director’s Order #24: NPS Museum Collection Management (2004); Director’s Order #28: Cultural Resource Management (1998); NPS-28, *Cultural Resource Management Guideline* (1998); and Director’s Order #6, Interpretation and Education (2005). The use of reproductions is preferred to the consumptive use of original objects.
- Requests for destructive analysis or testing of museum materials will comply with restrictions and procedures outlined in *Director’s Order #28* (1998) and require superintendent’s approval.
- Objects may be loaned to qualified institutions for exhibition or research use in keeping with the conditions cited in “Conditions for Outgoing Loans (Form 10-137A). No loans are made to individuals. Institutions must be able to adequately care for the loan and it is suggested that the borrowing institution complete a facility report to determine the risk of lending an object. A standard facility report can be purchased from the American Alliance of Museums. A condition report (Form 10-637) along with photographs of the loan should be completed by collections staff before it leaves NPS custody. Sensitive materials may require additional conditions prior to a loan commitment. Expenses related to the

loan of museum collection objects, including shipping and insurance, will be assumed by the borrower.

- Photographs or digital images of museum objects are to be made available to the public to provide an indirect use of the museum collection through publications and exhibits.
- 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 NAGPRA, unless such use is approved by the affiliated cultural group in addition to the regional director or director as described in NPS-28, Cultural Resource Management Guidelines. Exhibition of skeletal or mummified human remains or photos or replicas of them are specifically prohibited.

B. Restrictions

In accordance with 54 USC 300101 et seq.: Historic Preservation, commonly called the National Historic Preservation Act, Archeological Resources Protection Act (ARPA), as amended (16 USC 470aa-mm), 54 USC 100701-100707: System Resource Inventory and Management, Paleontology Resources Protection Act (Public Law 111-011) (PRPA), and NPS *Management Policies* (2006, sections 4.1.2. and 5.2.3), a park may withhold from the public sensitive and confidential information, including the specific location, character, nature, ownership, or acquisition of cultural resources, and the nature and specific locations of rare, threatened, or endangered species, commercially valuable resources, caves, minerals, and paleontological resources.

Under some circumstances, the NPS may be required by law to disclose confidential information acquired during consultations, public meetings, and other research, planning, and stewardship activities, or in association with the acquisition of resources, including museum collections. Therefore, the Monument cannot guarantee confidentiality of all information received. To the extent permitted by law, the Monument will withhold from public disclosure information provided by individuals who wish the information to remain confidential and the identities of individuals who wish to remain anonymous and who are protected from release by exemption under FOIA. The Monument should refer inquiries to the regional FOIA and Privacy Act officer for consultation and possible review.

Restrictions may be placed on the publication of images or manuscripts in the museum collection if these materials are subject to copyright, and the National Park Service does not hold the copyright.

All endangered, threatened, or rare plants and vertebrate and invertebrate animals will be collected only when accidentally killed or found deceased from natural causes.

C. Potential Hazards in Collections

Potential health and safety concerns may exist in NPS collections due to the nature of the object or specimen or to past management strategies. Some examples of inherent risks for natural

science collections include rocks and minerals which may be radioactive or contain asbestos, mercury, or arsenic; fossils from some formations are inherently radioactive and may emit high levels of radon; and fluid-preserved specimens are sometimes fixed or stored in formalin. Samples of materials from historic structures may contain asbestos, lead, arsenic, or other potential hazards. Historic and archeological collections may include objects with radioactive compounds; mercuric compounds; chromium, cadmium, and zinc; and lead. Deteriorating cellulose nitrate film emits nitrogen oxide gases. Deteriorating cellulose acetate film emits acetic acid. Ammunition and shells for historic firearms may be live. Medical, dental, and veterinary equipment may contain viable pathogens, or toxic or controlled substances. Industrial equipment, machines, and vehicles may also contain many types of hazards such as broken glass, rust, and pest-contamination.

Director's Order 24 (section 4.3.11) requires that curatorial staff notify users that collections may have been treated with potentially toxic substances. All individuals seeking direct access to NPS museum collections must be provided with DI-3320 "Notice of Potential Hazards in Museum Collections." The form must be completed before providing access to collections, including repatriations, traditional use, and loans of materials from the collection for management or research. Completed DI-3320s with original signatures must be retained by the Monument that is accountable for the collection being accessed for 120 years from the date the form is signed. If the recipient of the form declines to sign the form, document this in the notes section at the bottom of the form.

VII. MANAGEMENT ACTIONS

Pullman National Monument has identified the following management actions required to maintain and improve its collections:

This Scope of Collections should be reviewed and updated at five-year intervals. If there are changes because of new initiatives or changes in Park Service directives, the document updates will be sent to the Superintendent for approval and the Regional Curator for concurrence.

All artwork should be carefully inventoried and clearly marked as accessioned, decoration, or personal property.

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