

INDIAN AFFAIRS DIRECTIVES TRANSMITTAL SHEET

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EXPLANATION OF MATERIAL TRANSMITTED:

This chapter establishes the specific requirements and responsibilities of Indian Affairs (IA) headquarters and field staff for IA Museum Property Program management. Museum property collections are collected and preserved to further the mission of IA by preserving the history of the Bureau of Indian Affairs (BIA), Indian schools, and Indian culture for present and future generations.



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FILING INSTRUCTIONS:

Remove: None

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- 1.1 Purpose.** This chapter establishes the specific requirements and responsibilities of Indian Affairs (IA) headquarters and field staff for IA Museum Property Program management. Museum property collections are collected and preserved to further the mission of IA by preserving the history of the Bureau of Indian Affairs (BIA), Indian schools, and Indian culture for present and future generations.
- 1.2 Scope.** These policies and standards apply to all IA offices responsible for museum property management whether or not the property is in the possession of the office or on loan to another institution. The IA Museum Property Program scope of collection includes archaeological material from Indian and Federal lands, as well as artwork, ethnographic objects, and historical items representative of American Indian culture and the history of the BIA and the Bureau of Indian Education (BIE). The IA Museum Property Program is also responsible for the management of significant archaeological collections removed from Indian land under Antiquities Act permits and the associated documentation housed in Federal and non-federal repositories.
- 1.3 Policy.** It is the policy of Indian Affairs to:
- A.** Provide for the protection and conservation of museum property collections and to preserve their important ethnographic, historic, scientific, or artistic qualities.
 - B.** Provide for the accountability of management activities associated with museum property (planning, accessioning, cataloging, loans, transfers, etc.) consistent with federal and U. S. Department of the Interior (DOI) standards and requirements.
 - C.** Provide for the greatest benefit and enjoyment by the public by placing museum property objects and items within a broader context, through research, analysis and documentary records. Whether cultural, natural, artistic or historic, museum property is valuable for the information that it provides about processes, events, and interactions among cultures, individuals and the environment.
- 1.4 Authority.** The Departmental authority to acquire and preserve museum property appears in the following laws and regulations:
- A. Statutes.**
 - (1) 16 U.S.C. 470 et seq., National Historic Preservation Act of 1966, as amended (NHPA);
 - (2) 16 U.S.C. 470 Archeological Resources Protection Act of 1979, as amended (ARPA);
 - (3) 16 U.S.C. 469-469c, Archeological and Historic Preservation Act of 1974, as amended (AHPA);
 - (4) 16 U.S.C. 431-433, Antiquities Act of 1906; and

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- (5) 25 USC 3001-13, Native American Graves Protection and Repatriation Act of 1990 (NAGPRA);
- (6) Preservation, Arrangement, Duplication, Exhibition of Records (44 USC 2109);
- (7) 44 USC 3101 et seq., Federal Records Act of 1950, as amended ("Records Management by Federal Agencies");
- (8) 18 USC 42; 16 USC 3371-78Lacey Act of 1900, as amended;
- (9) 16 USC 703-712, Migratory Bird Treaty Act of 1918 as amended;
- (10) 16 USC 668-668d, Bald Eagle Protection Act of 1940, as amended;
- (11) 16 USC 1531-1543, Endangered Species Act of 1973, as amended;
- (12) 16 USC 1361-1407, Marine Mammal Protection Act of 1972, as amended.

B. Regulations.

- (1) 41 CFR 101, Federal Property Management Regulations (FPMR);
- (2) 43 CFR Part 7, "Protection of Archaeological Resources";
- (3) 25 CFR Part 262, "Protection of Archaeological Resources";
- (4) 36 CFR Part 79, "Curation of Federally-Owned and Administered Archeological Collections";
- (5) 36 CFR Part 1228, "Disposition of Federal Records."

C. Guidance.

- (1) Departmental Manual 411 DM 1 - Policy & Responsibilities for Managing Museum Property;
- (2) 411 DM 2 - Actions Required for Managing Museum Property;
- (3) 411 DM 3 - Standards for Managing Museum Property.

D. Handbooks.

- (1) DOI Museum Property Handbook Volume I: Preservation and Protection of Museum Property;
- (2) DOI Museum Property Handbook Volume II: Documentation of Museum Property.

1.5 Responsibilities.

A. Assistant Secretary, Indian Affairs discharges the duties of the Secretary with the authority and direct responsibility to protect and preserve Indian trust assets; and provides program and budget support to carry out Departmental requirements identified in 411 DM 2, 411 DM 3, and this Part.

B. Director, Bureau of Indian Affairs and Director, Bureau of Indian Education are responsible for ensuring the appropriate organizational arrangements, resources and personnel to implement 411 DM 2, 411 DM 3, and IA policies, standards, procedures and directives for accountability, reporting and protection of museum property housed in IA facilities within their jurisdiction. The Directors serve as the Senior Accountable Officials for IA museum property

housed within the BIA and BIE locations respectively and as such, are held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings.

C. Deputy Assistant Secretary – Management (DAS-M) serves as the Senior Accountable Official for IA Central Office museum property housed within the Washington D.C. metropolitan area and at field locations for Program Offices under Deputy Assistant Secretary's authority; as such, the DAS-M will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings.

D. Director, Acquisition and Property Management is responsible for insuring the Director of Field Operations, Property Management and Regional Property Officers comply with the established guidelines for inventory completion and certification of IA museum property and property records. Serves on the DOI Museum Property Executive Program Committee.

E. Director, Field Operations - Property Management is responsible for designating Regional Property Officers to conduct annual inventories for museum property housed in IA federal facilities, submitting the associated annual certifications and reports to the appropriate BIA Regional Director/ BIE Administrator and the IA Responsible Museum Program Manager / Curator.

F. Chief, Division of Operations and Maintenance, Office of Facilities Management and Construction ensures facilities inspections for IA federal facilities housing museum property occur **no less than** every 3 years. Facilities inspections must include standard elements identified in the Departmental Handbook such as those relating to fire detection and suppression, HVAC systems, air filtration systems, structural integrity etc. Facilities inspections promote preventative conservation through proper maintenance of the facilities housing museum property. The Chief provides to the Responsible Museum Program Manager / Curator, on an annual basis, a summary of the inspected facilities' condition assessments, findings and corrective actions for facilities housing museum property.

G. Division of Environmental and Cultural Resources Management, Office of Facilities, Environmental and Cultural Resources is responsible for the oversight of the Cultural Resources Program, which includes the IA Museum Property Program. The Division Chief designates the Responsible Museum Program Manager / Curator and staff curators with appropriate training, knowledge and experience for the oversight of the IA Museum Property Program and serves on the DOI Museum Property Executive Program Committee.

H. Museum Program Manager / Curator establishes IA Museum Property Program management policies and guidelines; prepares the IA Scope of Collections Statement and IA Collection Management Plan; manages and maintains IA's Interior Collections Management System (ICMS); oversees the preservation and conservation of IA museum property; validates physical

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inventories and facilities condition assessments at federal and non-federal facilities housing IA museum collections; supervises the IA staff curators and provides training to field staff in day-to-day museum property management. The Museum Program Manager / Curator represents IA on the DOI Museum Program Committee; submits mandatory annual reports to the Department; coordinates with the IA Chief Archaeologist and National Park Service on IA NAGPRA compliance as well as with non-federal museum managers / curators on NAGPRA related matters; and monitors the use and care of NAGPRA collections on loan to other institutions.

I. IA Staff Curators perform technical duties in connection with managing the IA museum property, collaborate with BIA Regional archaeologists; and prepare the Scope of Collections Statements and the Museum Housekeeping Plans for field locations. The IA staff curators conduct and / or verify annual environmental inspections and physical inventories of federal and non-federal facilities housing museum property; monitor the use and care of the collection; maintain a nationwide database of information and documentation on the IA collection; and train and provide technical assistance to field staff. Ensure Departmental and IA guidance and standards are consistently implemented to properly accession, catalog, photograph and account for museum property. Annually prepare the fiscal year Collections Management Report (gives information on the size of the museum collection and collection activity during the fiscal year such as accessions, loans, losses, cataloging, and use of the collection) and submit the report to the Museum Program Manager / Curator.

J. BIA Regional Directors serve as the Regional Accountable Official for museum property within their respective Regions and as such, will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings. Regional Directors certify, to the IA Director, Field Operations - Property Management, the accuracy of the annual inventory and facilities condition assessment of museum property within their Regions. The condition of the museum collection is dependent upon the condition housing the collection, which must meet Departmental standards for facilities housing museum collections. Regional Directors must designate facility field staff with collateral duty to provide for day-to-day on-site management of museum property in all field locations.

K. Agency Superintendents / Project Managers / Field Representatives at IA facilities serve as the Accountable Official for museum property within their respective agencies, projects and locations and as such, will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings. Superintendents certify to the IA Director, Field Operations - Property Management the accuracy of the annual inventory and facilities condition assessment of museum property housed within their jurisdiction; and designate staff with collateral duty to provide for day-to-day on-site management of museum property.

L. BIE School Administrators / Principals at IA facilities serve as the Accountable Official for museum property within their respective School and as such, will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings. BIE Administrators / Superintendents / Principals certify to the IA Director, Field Operations - Property Management the accuracy of the annual inventory and facilities condition assessment of museum property housed within their jurisdiction; and designate staff with collateral duty to provide for day-to-day on-site management of museum property housed at the school.

M. IA Regional Property Officers are responsible for conducting annual inventories for museum property housed in IA federal facilities, submitting the associated annual certifications and reports to the appropriate BIA Regional Director/ BIE Administrator and the IA Responsible Museum Program Manager / Curator, and designating Custodial Property Officers.

N. Custodial Property Officers are museum property custodians who manage and account for the IA museum property of all BIA and BIE locations within the Region. They ensure proper inventory of museum property; issue receipts for property (DI-105) to the accountable person at that location; maintain receipts for museum property in all locations under their jurisdiction; and maintain regional museum property records and documentation such as accession information; inventory lists; and scope of collection statements.

O. BIA Facility Field Staff provide for day-to-day on-site management of museum property in all field locations. Facility field staff responsibilities include museum property safety, security, housekeeping, pest management, fire protection, and emergency management. Facility field staff are responsible for keeping the museum records for their area of accountability; notifying the Regional Director and Regional Property Officer of any loss, theft, damage, or destruction of museum property upon discovery; and maintaining the annual museum management plans.

P. BIA Regional Archaeologists provide intellectual information to the Museum Program Manager / Curator and staff curators for cataloging, and conduct annual physical inspections of field locations for the condition of museum property. They offer technical expertise and assistance in the areas of archaeology, anthropology and cultural resources, NAGPRA and NHPA.

1.6 Definitions.

A. Accessioning is the process by which the government formally accepts and establishes permanent legal title (ownership) and or custody for a museum object or group of museum objects to be held in trust for the American people and documents the circumstances of possession. A single accession transaction occurs when one or more objects are acquired in the same manner from one source at one

time for the museum property collection. A unique accession number is assigned to each accession transaction, not each object.

B. Accountable Official is a federal government employee with overall responsibility for a specified group of museum property and is responsible for ensuring accountability.

C. Cataloging is assigning and applying a unique identifier (catalog number) to an object or specimen or group of objects or specimens and completing the descriptive and intellectual documentation. All accessioned items must be cataloged.

D. Collection Management Plan assesses a unit's museum property management program, identifying problems, and making recommendations for improvement. The plan focuses on such management concerns as the Scope of Collection Statement, museum records, environmental conditions in spaces housing museum property, conservation treatment needs, security and fire protection, staffing, and funding.

E. Custodian a federal government employee responsible for the daily control and supervision of personal property assigned to them.

F. Inventory is to verify the physical location of objects and accuracy of records and documents.

G. Museum Housekeeping Plans provide schedules for preventive treatments in terms of what needs to be done, and generally, how often based upon consideration of the nature and condition of museum collections; identify the location of museum collections; identify both routine housekeeping tasks and special housekeeping projects; and identify equipment, materials, and techniques for carrying out housekeeping tasks).

H. Museum Property is identified within the context of legal requirements, IA's mission and management objectives, and the Scope of Collections statement. Museum Property is recognized as distinct from other categories of personal property because it possesses attributes that warrant its preservation in perpetuity. These attributes may be scientific, historic, or artistic, but share in common the potential to enrich human experience in ways that property intended for routine use normally does not. A "museum object" or "object" is a generic term for an item of museum property. Museum property does not include those items necessary to display a collection such as exhibit cases, dioramas, special lighting, graphics, replicas, etc. Museum property must be recorded and controlled in the Interior Collection Management System or other approved museum management system.

I. Museum Records prove ownership, describe the material in the collection, document loans, and locate objects. Museum records insure that museum

collections are physically and intellectually available for collections management, interpretation, exhibition, and research. They give accountability for the collection.

J. Preservation and Conservation - The primary goal of object conservation is to preserve objects and specimens in as stable a state as possible to prolong its life. In DOI, object conservation is an ongoing process of preventive conservation supplemented by conservation treatment when necessary. Preventive Conservation employs non-intrusive action(s) to prevent damage and to minimize deterioration of objects and associated data. Such actions include monitoring and controlling environmental agents (e.g. light, relative humidity, temperature, air pollution and pests); practicing proper handling, storage, exhibit, packing and shipping techniques; implementing a housekeeping program; and addressing the care of museum property in the office's emergency management plan.

K. Scope of Collection Statement is a brief document that clearly defines the scope of the museum property holdings at present and for the future and is required for all IA offices possessing museum property.

1.7 Standards, Requirements, and Procedures. Standards for managing museum property are based on Departmental policy and on professional museum practices. They apply to all museum property, both in bureau and non-bureau facilities. The following describes the steps necessary to preserve, protect, document, accession, catalog, inventory, and loan museum property.

A. Standards to Preserve and Protect Museum Property.

IA must use the following standards for preventive conservation of museum property in administrative offices, storage space or on exhibit as identified in 411 DM 3. IA must write and consistently implement procedures for the following standards.

1. Environmental Standards. House museum property and associated documents in a safe, stable environment, appropriate to the specific environmental needs of the individual material type. This will reduce the museum property's rate of deterioration, prolong its life, and minimize the need for conservation treatment. IA must consider the goals of energy conservation in the decision-making process for controlling relative humidity and temperature. Specific standards for temperature, relative humidity, light, pests, and air pollution are defined in 411 DM 3.

2. Security Standards. Secure office, storage and exhibit spaces and limit access to curatorial staff and people with a legitimate reason to enter. Use an appropriate combination of mechanical and electronic security systems. Address any special needs of the museum property in an emergency management plan.

3. Fire Protection Standards. Install equipment and/or systems to detect

and suppress fire in spaces housing museum property. Select systems appropriate to the nature of museum property in the space, and to the structure in which it is housed. Make spaces housing museum property fire-resistant to the extent possible given the nature of the structure. Store museum property records in an appropriate fire- and burglary-resistant container or vault, and lock it when not in use. Address the needs of museum property in preventing, detecting, and suppressing fire in a fire plan. Avoid storing flammable liquids in the museum property storage area.

4. Housekeeping, Physical Examination, and Conservation Treatment Standards. Follow housekeeping standards, physically examine museum objects, and arrange for appropriate conservation treatment as outlined in 411 DM 3.

5. Storage Standards. Safe and secure storage of museum property requires dedicated space. IA should (a) Provide dedicated storage space(s) large enough for existing museum property to the extent possible; (b) Organize storage space to allow for the efficient use of storage equipment and techniques; (c) House museum property in appropriate equipment and containers and use appropriate museum-quality materials for packaging.

6. Exhibit Standards. Objects on exhibit are more likely to deteriorate, or to be stolen or vandalized than objects in storage; therefore exhibit museum property in ways that minimize risks, promote security, housekeeping, and preservation of the museum property.

B. Standards to Document Museum Property. IA must document all museum property in an information system containing the mandatory data for each activity described below.

- 1. Accessioning Standards.** IA can accession museum property by donation, purchase, transfer, or field collection. The Responsible Museum Program Manager must review and approve all accession actions.
 - a. Record as a single accession transaction the acquisition of one or more object(s) in the same manner, from one source at one time, for the museum property collection;
 - b. Avoid restrictions on the future use of acquisitions;
 - c. Complete a transfer of title (ownership) and/or custody signed by authorized parties;
 - d. Include transfer of all copyrights where appropriate;
 - e. Use the following acid-free materials: a bound accession book, an accession form, an accession receiving report or equivalent, an accession folder;
 - f. Record mandatory data for each accession in the accession book or in

supplementary documents filed in the accession folder. If they are filed elsewhere, note their locations in the accession folder; and

g. Use the mandatory data for accessions identified in 411 DM 3.

2. Cataloging Standards. Ensure that cataloging places museum property in the appropriate disciplinary classification to provide access.

a. Record the physical description; associations with people, resources, or events; interpretive and research data about object(s); and museum property management data (for example, current location and item count);

b. Catalog objects appropriately for the discipline;

c. Assign a unique identifying catalog number to an object or group of objects, and document actions completely;

d. Complete all categories for which data are available; and

e. Use the mandatory data for cataloging identified in 411 DM 3.

3. Inventory Standards.

a. **Annual Inventories.** Physically verify, or verify in writing through appropriate instruments, the presence and condition of museum property listed in the inventory for property located in both Federal and non-Federal repositories. IA must do the following annual inventories:

i. A 100% inventory of all controlled museum property, unless the Responsible Museum Program Manager has approved an exception and an alternate plan for units holding large amounts of controlled museum property;

ii. A random sample inventory of all other cataloged museum property, unless the collection has fewer than 250 cataloged objects, in which case a 100% inventory is required; and

iii. A 100% inventory, by accession number (that is, by number of containers rather than by individual objects), of all accessioned but as yet un-cataloged museum property, unless the collection has 25 or more accessions that are not yet cataloged, in which case a random sample may be used.

b. **Other Inventories.**

i. A 100% inventory of all museum property may be required if there is an indication that a substantial loss has occurred or a significant number of items are unaccounted for; and

ii. A 100% inventory or a certification is required whenever the designation of accountability changes (410 DM).

- c. **Mandatory Inventory Requirements.** An inventory must verify the:
- i. Item count;
 - ii. Location of the object;
 - iii. Accuracy of the records;
 - iv. Accuracy of the object number wherever it occurs; and
 - v. Condition of the object.
- d. **Reconciling Inventories.** IA must reconcile the inventories of museum property. Do not reconcile museum property records to a general ledger account. IA must accession and catalog items found during the inventory, that were not previously listed in the IA museum records, following 411 DM 3.4 For missing museum property IA will:
- i. Process Reports of Survey (DI-103) in compliance with 410 DM; and, if applicable,
 - ii. Request the Department of the Interior Inspector General to investigate the situation as described in 355 DM, Departmental Investigations, Part 2, Scope of Investigations and Reporting Requirements and 410 DM, Property Irregularities.
- e. **Certifying Inventories.** Certify in writing to the IA Director Field Operations - Property Management Officer the status of annual inventories of museum property and their reconciliation.

4. Loan Standards.

- a. Document each loan (both incoming and outgoing) by assigning a unique number and completing a loan agreement, cooperative agreement, memorandum of agreement, or similar instrument; use a system of tracking (for example, record all loan transactions in a bound acid-free book);
- b. Include conditions for shipping, handling, and insurance in the loan agreement;
- c. Include an itemized list of museum property in the loan agreement;
- d. Obtain the authorized signatures of both the borrower and lender on all agreements;
- e. Store all agreements in acid-free folders;
- f. Seek blanket approval from the Archivist of the United States for all outgoing loans of permanent records to non-Federal recipients, as required by 36 CFR 1228.76;
- g. Lend museum property only for official purposes;
- h. Prevent museum property from being used for commercial purposes or private pecuniary gain except where specifically authorized by law;

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- i. Lend to institutions, organizations and governmental agencies that are qualified to handle museum property;
 - j. Avoid making outgoing loans to individuals; and
 - k. Document the mandatory data identified in 411 DM 3 for all loan agreements.
- 5. Other Temporary Custody Standards.** Use a temporary custody receipt or equivalent document for holding museum property in temporary custody (for example, for purposes of identification, review for possible donation, or examination for purchase).
- a. Use the receipt only for short-term custody without insurance;
 - b. Obtain the authorized signatures of both the borrower and lender on the receipt; and
 - c. Limit use of temporary custody receipts to a time limit for short-term custody.
- 6. Deaccessioning Standards.** IA does not have disposal authority for museum property. Reports of Survey due to loss, theft, damage, destruction, or abandonment (410 DM) may potentially lead to deaccessioning.