



# Department of Defense Legacy Resource Management Program

Project 00-107

## **Commander's Guide To Archaeological Curation - Workbook**

US Army Corps of Engineers, St. Louis District  
Mandatory Center of Expertise for the Curation and  
Management of Archaeological Collections

February, 2005

This Document Is Unclassified And May Be Released To The Public

# Commander's Guide to Archaeological Curation

*The Commander's Guide to Archaeological Curation is a compilation of information collected or produced by the U.S. Army Corps of Engineers' Mandatory Center of Expertise for the Curation and Management of Archaeological Collections (MCX-CMAC). Recommendations are based on the MCX-CMAC's interpretations of federal laws and regulations, and are the professional position of MCX-CMAC. This guide is intended for use by installation personnel with limited experience in archaeological collections care, but who have responsibility for the long-term care of these collections. This guide is an easy-to-understand "roadmap" on installation responsibilities under the law and procedures for curating archaeological collections. This guide should be used in conjunction with, but shouldn't replace, an installation's Cultural Resource Management Plan (CRMP) or Integrated CRMP (ICRMP). Elaboration on the following recommendations may be found in, Guidelines for the Field Collections of Archaeological Materials and Standard Operating Procedures for Curating Department of Defense Archaeological Collections prepared for the Legacy Resource Management Program Office, produced by the U.S. Army Corps of Engineers, St. Louis District, MCX-CMAC.*

## **Background**

The Department of Defense (DoD) is responsible for the management of archaeological resources on installation property and for the archaeological and historical properties removed from these lands, in addition to any associated records generated by archaeological projects—even when no archaeological resources or historic properties are present. DoD is also responsible for the management of these resources and their long-term care, otherwise known as curation. As mandated by federal law, installations are *required* to ensure that all recovered archaeological materials and the associated records are adequately "curated" or housed under conditions specified by federal regulation. These collections are the raw data generated by archaeological projects and, as such, represent a non-renewable resource. They are the only physical record of our national heritage for the prehistoric and the early historic eras, and as such, are not replaceable. Thus, as a land-managing agency, DoD is the steward for the very American cultural history it strives to protect and defend as an agency.

DoD collections are public property, the result of many years of archaeological research and the expenditure of millions of dollars of federal funds. A typical federally-sponsored archaeology program should provide for the recovery of materials from archaeological sites if warranted, a descriptive analysis of the recovered items, publication and circulation of a final report, and placement of collections in adequate storage facilities for preservation and future study. DoD, like many federal agencies, did not consider how collections would be maintained once an archaeological project ended. Inadequate funding and attention to the needs of these collections have snowballed into the cumulative effect of missing and neglected collections that do not meet the minimum curation requirements of regulations that govern these materials.

## **Need**

All federal archaeological investigations create an archaeological collection that must be properly curated to ensure its long-term preservation (see 36 CFR Part 79.4(a)). Once archaeological materials are collected from a location, their actual spatial context is destroyed. However, information on the spatial context, characteristics of the archaeological materials, and the archaeological materials themselves continue to have significant historical, educational and scientific value. Similarly, records created during an investigation not only provide information about the field and/or laboratory investigations, they also document the content and context in which any interpretations and conclusions are made. There is always an administrative record for every archaeological project, even when no archaeological materials were collected. Even when there is only an administrative record, it must be properly curated because this record documents the decision making process. Documentation for historic properties that are eligible or not eligible for nomination to the National Register of Historic Places must also be properly curated

**By preserving archaeological materials and records together as complete sets, data can be repeatedly re-examined. Archaeologists, historians, Native elders and artisans, educators, property managers, and the public-at-large are interested in examining information derived from these data sets. This re-examination and reinterpretation can only occur if these data sets (the archaeological materials and records) are preserved as a unit.**

From the moment archaeological materials are recovered or documents are created, every action, whether intentional or not, has an effect on their long-term preservation, as well as their suitability for future observation, analysis, or exhibition. The selection and combination of materials used to produce a record or recover archaeological materials, their primary and secondary uses, the conditions under which they existed until they were excavated, collected, or stored, all affect their condition and ultimate survivability.

## **Guiding Principles for Curation**

Four principles should guide DoD's curation instructions to installations. These principles are:

### ***1. Curation begins before archaeological materials are collected or a document is created.***

Before an archaeological project is implemented, a short and long-term plan for management of the archaeological materials and records must be in place. Funding should be allocated during the planning phase of any investigation to fund the arrangements that must be made for the resulting collection. A short-term management plan should outline all field, laboratory, and conservative procedures associated with the recovery of the archaeological materials. Minimally this will include protocols associated with an artifact collection strategy and cleaning procedures, producing an artifact field catalog and inventory, and materials used in the field to

house and store the artifacts. Associated records that are generated during a project should be printed on acid-free paper. A duplicate or safety copy should be made of all documentation.

A long-term curation plan must include the provisions outlined in the short-term (field) plan, in addition to addressing the requirements of 36 CFR Part 79, Curation of Federally-Owned and Administered Archeological Collections. Table 1 illustrates the requirements of 36 CFR Part 79 and provides a breakdown of the requirements coupled with recommendations to implement them. The “check list” approach to implementing 36 CFR Part 79 in Table 1 will aid installation personnel in achieving a quick summary of their compliance status. Minimally, an installation’s curation plan should include designating a repository where collections will be curated according to the requirements of 36 CFR Part 79.

**2. *Consider that all actions may have permanent rather than temporary effects.***

Every action or treatment associated with archaeological materials and records should be reversible if at all possible. Use only archival quality materials at all stages of an archaeological investigation, regardless of whether the present action is intended to be temporary or permanent. Many extant collections that initially received “temporary measures” to conserve the collections until they could be treated with more permanent or archival measures, still maintain the “temporary” methods and materials used. As a result, improper initial curation has decreased the survivability of these collections.

**3. *Document each action.***

This principle can best be implemented by the creation of a Curation History for each collection. A curation history can detail how the collection was excavated, processed, created, labeled, and packaged and what products were used in each of these steps. Specific notations on individual specimen condition, treatment, destructive analysis, etc., can be recorded in the collection catalog.

**By documenting each action, installation personnel maintain a chain of custody and administrative control of collections.** In turn, these data may provide critical information to future users of the collection. Are specific specimens or collections suitable for particular research questions, analytical techniques, or public interpretation? Have previous conservation treatments, such as cleaning, mending, or repairing, contributed to the present condition of an artifact? Was an artifact found in a context that suggests it may be a funerary object or a sacred object? Answering these questions is possible when collection information is regularly maintained.

**4. *Curate collections in a repository that meets the basic standards required by 36 CFR Part 79.***

A repository must be able to provide curation services that are both long-term and professional. Temporary storage provided by an archaeological contractor or by an installation are not suitable unless these two criteria are met. Many of the standards in

36 CFR Part 79 are listed in the most general terms. MCX-CMAC's recommendations for implementing these standards, can be used to evaluate potential curatorial services and facilities, as well as provide a summary of an installation's compliance status (Table 1).

## **Legal Framework and Requirements for Curation**

Federal legislation requiring curation or preservation of archaeological resources includes:

- National Historic Preservation Act of 1966  
Sec. 101(a)(7)(A) states that “the Secretary (of the Interior) shall promulgate, or revise, regulations...for curation, documentation, and local government certification ensuring that significant prehistoric and historic artifacts, and associated records, subject to section 110 of this Act, the Act of June 27, 1960 (16 U.S.C. 469c), and the Archeological Resources Protection Act of 1979 (16 U.S.C. 470aa and following) are deposited in an institution with adequate long-term curatorial capabilities.” See 36 CFR Part 79 below.
- National Environmental Policy Act of 1969  
Sec. 101 (b)(4) specifies that it is the “continuing responsibility of the Federal Government to use all practicable means...and resources to the end that the Nation may – preserve important historic, cultural and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice; ...” This language may allow installations who are receiving funding allocated for NEPA compliance activities, to pay for archaeological collections rehabilitation and curation.
- Archeological Resource Protection Act of 1979  
When necessary, an ARPA permit is required to conduct archaeological research on federal lands. The permit requires that any archaeological resources that are excavated or removed from public lands remain the property of the United States, and as such, these resources and copies of associated archaeological records and data will be preserved by a suitable university, museum, or other scientific or educational institution.
- Native American Graves Protection and Repatriation Act of 1990  
NAGPRA requires consultation with affiliated tribes. The conditions under which collections are curated may be an issue that needs to be discussed during consultation. NAGPRA also requires that an inventory, summary, and publication of findings for those collections that fall under NAGPRA be made by all federal agencies.

- 36 CFR Part 79 Curation of Federally-Owned and Administered Archeological Collections (1991)
  - (a) All federally owned or managed collections, including both pre-existing and new collections, should be placed in an appropriate repository that has the capability to care for the long-term curation of collections.
  - (b) A “suitable” repository must demonstrate that it has the facilities, written curatorial policies, and operating procedures that satisfy 36 CFR Part 79 requirements.
  - (c) Installation commanders must sign an agreement with each repository outlining the conditions for curation of the collection.
  - (d) If a collection was recovered from Indian lands, written consent is needed from the Indian landowner and the Indian tribe having jurisdiction over the land, before depositing the collection in a suitable repository.
  - (e) Collections being deposited must be processed according to the chosen repository’s standards.
  - (f) Collections and services must be reviewed/inspected periodically by the federal agency.
  - (g) It is the installation commander’s responsibility for maintaining records of agreement with repositories where collections are located, along with a catalog of the collections and copies of the reports. Note: In the absence of an installation commander, as in the case of bases either closed and/or realigned, the responsibility is delegated up to the Major Command for that closed/realigned base.

DoD-wide guidance consists of:

*Note: Military history collections guidance are not included here since archaeological collections fall outside each service’s military museums’ jurisdiction.*

- Department of Defense Instruction 4715.3 (Environmental Conservation)(11/11/96)  
The Instruction’s purpose is to “implement policy, [and] assign responsibility (Section A. Purpose)” for managing natural and cultural resources, and states the DoD’s commitment to identifying and curating archaeological materials in a manner that complies with legally mandated requirements (D.3.a). It also stipulates that “All DoD facilities and installations shall...plan, program, and budget to achieve, monitor, and maintain compliance with all applicable...regulatory requirements...” (D.1.b). Within the Procedures Section of the Instruction, it states that “Before disposing of DoD properties, the DoD Component with responsibility for the property shall: (1) Identify all significant natural and cultural resources” and (3) “Ensure that ‘museum objects and documents’ are identified and preserved.” (F.1.k.1.(1)(3)).

Service-wide guidance includes:

- **U.S. Air Force**
  1. 13 May 1992 letter from CEV to All Air Force Major Commands Concerning Air Force Curation of Archeological and Historical Data, Signed By Col. Peter Walsh, Director of Environmental Quality, Office of the Civil Engineer

The two page letter emphasizes the need to curate archaeological collection according to the guidelines in 36 CFR Part 79, that repositories where these collections are located need to meet the same guidelines, that archaeological materials and the associated documentation should be curated in the same facility, and that use of the collections for research and ritual activities is permitted.

2. Air Force Instruction 32-7065 (6/13/94)

Each Major Command should have a complete and current Cultural Resources Management Plan (CRMP). Field identification studies for archaeological resources should be conducted using the Secretary of the Interior's Standard for Identification. The Instruction does not address curation as part of the CRMP.

3. HQ Air Mobility Command, Curation Guidelines for Archeological Collections (Draft)

The guidance first defines basic collection management terms such as associated records, collection, and material remains. Criteria for choosing a repository are presented along with the standards that the repository should follow to properly care for collections. The guidance ends with suggestions for processing both material remains and associated documents to ensure that they will be available in the future.

• **U.S. Army**

1. Army Regulation 200-4 (1/8/98)

The regulation describes general policy requirements for archaeological resources and historic properties that all Army component agencies need to address as part of their environmental compliance programs. Curation is specifically addressed in section (2-7) on compliance with 36 CFR Part 79. *Installation commanders* are responsible for compliance with the requirements of 36 CFR Part 79. AR 200-4 recommends against establishing curation facilities on post. Any requests to do so, must be accompanied by a cost analysis that demonstrates the cost effectiveness of on-post curation versus existing professional curation facilities. Procedures to reduce the amount of archaeological materials collected in the future should be incorporated into Integrated Cultural Resource Management Plans (ICRMPs) and other management documents.

2. Department of the Army PAM 200-4 (1/8/98)

The pamphlet is a companion to AR 200-4 and restates the regulation's guidance for curation (Chapter 3-8), but emphasizes that collections must not be stored in inappropriate facilities, that installation personnel should inspect repositories for adherence to 36 CFR Part 79, and that curation must be cost effective. A "no collecting" policy is stressed for initial identification studies, thus archaeological materials are described in the field but not collected. This is intended to reduce the volume of materials to curate.

- **U.S. Army Corps of Engineers**

*Note: USACE tailors federal laws and regulations affecting the curation of archaeological collections to its civil works program through Engineering Regulations (ER) and Engineering Pamphlets (EP). Military activities follow the requirements set forth by Army Regulations (AR) and are not generally applicable to the Corps civil works program. Army requirements are discussed above.*

1. ER 1130-2-540 (November 15, 1996), Environmental Stewardship Operations and Maintenance Guidance and Procedures, Chapter 6, Cultural Resources Stewardship

Chapter 6 “establishes the policy for the management and protection of cultural resources at operating civil works water resources projects for which the U.S. Army Corps of Engineers is responsible.” Section 6-2 describes the function of the MCX-CMAC as managing “Corps-wide curation needs assessments and design services.” A Curation Field Review Group was previously established by the Director of Civil Works and provides comments on the MCX-CMAC Corps-wide curation programs.

2. EP 1130-2-540 (November 15, 1996), Environmental Stewardship Operations and Maintenance Guidance and Procedures, Chapter 6, Cultural Resources Stewardship

Chapter 6 “establishes guidance for management of collecting, preserving and curating archeological and historical materials at civil works resource projects . . .” Section 6-4 provides guidelines for access and use of Corps collections. Section 6-5, *Guidance for Collection Management*, includes standards for processing and placing collections into collections management centers as well as standards to be followed by the centers in providing curation services. The section concludes with the funding mandates for the care of archaeological collections.

- **U.S. Navy and U.S. Marine Corps**

1. SECNAVINST 4000.35 (8/17/92)

The Instruction provides overall policy guidance for cultural resources but does not specifically mention curation. It does not reference 36 CFR Part 79.

2. OPNAVINST 5090.1B, Environmental and Natural Resources Program Manual, CH1 (2/2/98), Chapter 23 (Historic and Archeological Resources Protection)

Every Archaeological Resources Protection Act permit holder must ensure that all artifacts are properly curated (23-4.4). The Commander, Naval Facilities Engineering Command (COMNAVFACENGCOM) issues ARPA permits for Navy lands and is also responsible for the “disposition of archeological collections (23-6.2).” All shore installation commanding officers shall “provide for storage and professional curation of salvaged archaeological resources [and] provide for storage of records that might accrue in carrying out legal compliance activities (23-6.6.k).”

3. Marine Corps Order P5090.2A, Environmental Compliance and Protection Manual (7/10/98), Chapter 8 (Historic and Archaeological Resources Protection)

Curation of archaeological resources and records is mentioned as one of the responsibilities of an installation's Commanding General or Commanding Officer (Chapter 8, Section 301, No. 11) for compliance actions.

## **Who is Responsible?**

Who is charged with the responsibility of ensuring that collections are being properly curated? For the purposes of managing archaeological collections and their curation responsibilities, DoD installations fall into three general categories.

1. Active Installations

Each installation commander has direct responsibility for ensuring compliance with the curation of archaeological collections. This responsibility is typically delegated to the installation's environmental office where personnel are assigned the responsibility for all archaeological compliance on base. Curation of archaeological collections, both physical materials and all associated documentation, must be included in these duties.

During the process of selecting a repository to curate any archaeological collections, the contracting officer and legal office should be involved in determining how to meet the installation's competition in contracting requirements to procure curation services. When collections are placed in a repository that meets the standards outlined in 36 CFR Part 79, a curation agreement should then be signed by both the installation commander and the repository. This agreement will define the conditions for curating DoD collections and the funding necessary to maintain compliance.

2. Installations currently going through closure activities (minimal military presence)

Personnel assigned responsibility for closure activities and for compliance with NEPA, must also comply with requirements for curation of federal archaeological collections. Arrangements need to be made for the long-term storage and care of any archaeological collections. Collections must be arranged and housed under conditions outlined in 36 CFR Part 79, and agreements must be signed with suitable repositories where collections are currently located or where they will be located. The installation commander and the individual who signed the curation agreements, may then relinquish the responsibility of the collections to the installation's Major Command (MACOM). The conditions for curation outlined in these agreements become the responsibility of the MACOM Commander.

3. Closed installations (no military presence)

If an installation has been fully closed and the land once owned and/or managed by DoD has been turned over to other parties, then the MACOM to which the installation once belonged within must become the responsible party for the collections. The MACOM is still required to comply with regulations governing curation of federal collections, even though DoD no longer owns or uses the land. The archaeological material and all associated records and data are still the property of the U.S. The MACOM inherits the responsibility associated with the long-term care and preservation of these federal collections for all of its closed and realigned installations. Personnel at the MACOM level must maintain administrative control over (1) the extent of the collections, (2) their location, (3) their condition, and (4) all agreements that were signed between the installation and repository.

**How to do this?**

If individual installations are to meet the legal requirements of curating archaeological collections, they must have all their archaeological resource information compiled. This assumes that for each DoD installation -

1. All archaeological investigations on an installation are known.
2. All sites recorded on an installation are reported.
3. All material remains that have been recovered, both during planned actions and any inadvertent finds, are reported.
4. The location and condition of all material remains are known.
5. The location and condition of all associated documentation are known.

If any of the assumptions are not true, then installation staff need to compile that information. After all the information is available, the next step is to properly curate all archaeological collections to the standards of 36 CFR Part 79 (see Table 1). Personnel responsible for the duties of archaeological curation compliance, whether at the installation or the MACOM level, may use Table 1, which outlines the requirements which must be met for both physical archaeological materials and all associated records and data.

**Table 1. Implementing the Requirements of 36 CFR Part 79**

<b>Applicable Section of 36 CFR Part 79</b>	<b>Affected Collection</b>	<b>Implementing Action (Check boxes if present)</b>	<b>Compliance Status (Check box for compliance level)</b>
<b>Professional Museum Practices (79.9(a))</b>	Archaeological Materials	<ul style="list-style-type: none"> <li>• Maintain written policies and procedures for museum staff and prospective collection donors.</li> <li>• Review policies periodically.</li> <li>• Policies should include:                             <ul style="list-style-type: none"> <li><input type="checkbox"/> Field Curation Procedures</li> <li><input type="checkbox"/> Standards for Acceptance of Collections</li> <li><input type="checkbox"/> Accession and Deaccession Procedures</li> <li><input type="checkbox"/> Collections Management Policy (including care of collections; access policy; conservation procedures; use of specimens for research, ceremonies, destructive analyses, exhibit, loans, and publication)</li> <li><input type="checkbox"/> Emergency Plan</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Written policies in draft form only</li> <li><input type="checkbox"/> Informal, unwritten policies followed</li> <li><input type="checkbox"/> No policies in practice</li> </ul> <p>Comments:</p>
	Associated Documentation	<ul style="list-style-type: none"> <li>• Maintain a written records' management plan.</li> <li>• Review plan periodically.</li> <li>• Policies should include:                             <ul style="list-style-type: none"> <li><input type="checkbox"/> Field Curation Procedures</li> <li><input type="checkbox"/> Standards for Acceptance of Collections</li> <li><input type="checkbox"/> Accession and Deaccession Procedures</li> <li><input type="checkbox"/> Records Management Plan ( including: policies for tracking records, processing and rehabilitating records, conservation procedures, creating finding aids, access policy, and use of records for exhibit, loan, and publication)</li> <li><input type="checkbox"/> Emergency Plan.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Written policies in draft form only</li> <li><input type="checkbox"/> Informal, unwritten policies followed</li> <li><input type="checkbox"/> No policies in practice</li> </ul> <p>Comments:</p>

<p><b>Accession</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Create an Accession Record for each collection. Accession Record should include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Collection owner</li> <li><input type="checkbox"/> Provenience</li> <li><input type="checkbox"/> Acquisition history</li> <li><input type="checkbox"/> Terms of the curation agreement</li> <li><input type="checkbox"/> General description of the collection</li> </ul> </li> <li>• Create a collection file that includes the <ul style="list-style-type: none"> <li><input type="checkbox"/> Accession Record</li> <li><input type="checkbox"/> Initial inventory and assessment of the artifacts</li> <li><input type="checkbox"/> Ongoing curation procedures</li> <li><input type="checkbox"/> Uses of the collection</li> <li><input type="checkbox"/> Physical location(s).</li> </ul> </li> <li>• Assign a unique accession number.</li> <li>• Cross-index all collections by archaeological site number.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Accession records contain incomplete data</li> <li><input type="checkbox"/> Accession records not present</li> <li><input type="checkbox"/> Accession numbers not used</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Create an Accession Record (if one has not already been created for the artifacts). Accession Record should include: <ul style="list-style-type: none"> <li><input type="checkbox"/> All documentation associated with the original archaeological investigation</li> <li><input type="checkbox"/> Initial inventory and assessment of the documents for retention and condition</li> <li><input type="checkbox"/> Preservation worksheets for documents that require special treatment</li> <li><input type="checkbox"/> Storage location</li> </ul> </li> <li>• Cross-index any associated artifacts.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Accession records contain incomplete data</li> <li><input type="checkbox"/> Accession records not present</li> <li><input type="checkbox"/> Accession numbers not used</li> </ul> <p>Comments:</p>

<p><b>Catalog</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Assign a unique specimen number to each object or lot.</li> <li>• Record catalog number and all associated data into a catalog list or computerized database. Data should include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Provenience</li> <li><input type="checkbox"/> Condition</li> <li><input type="checkbox"/> Description of object</li> </ul> </li> <li>• Cross-index any associated documentation</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Catalog numbers assigned, but complete catalog list or database is incomplete</li> <li><input type="checkbox"/> Catalog numbers assigned, but complete catalog list or database is missing</li> <li><input type="checkbox"/> Catalog numbers not used</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Organize and arrange documentation according to the guidelines in the records management plan, and assign a unique identification number.</li> <li>• Record catalog number and all associated data into a catalog list or computerized database. Data should include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Provenience</li> <li><input type="checkbox"/> Condition</li> <li><input type="checkbox"/> Description of record (e.g., format type)</li> </ul> </li> <li>• Create archives finding aid. <ul style="list-style-type: none"> <li><input type="checkbox"/> Maintain both paper and electronic forms.</li> <li><input type="checkbox"/> Paper copies should be printed on acid-free paper with a laser printer.</li> </ul> </li> <li>• Create a duplicate or safety copy of each records collection. Safety copy can be made on: <ul style="list-style-type: none"> <li><input type="checkbox"/> Acid-free paper</li> <li><input type="checkbox"/> Archival microfilm, or, if quick access is critical and affordable,</li> <li><input type="checkbox"/> Electronic media such as digital scanning onto CD-ROM</li> </ul> </li> <li>• Index all associated documentation by format type and contents.</li> <li>• Cross-index any associated artifacts.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Catalog numbers assigned, but complete catalog list or database is incomplete</li> <li><input type="checkbox"/> Catalog numbers assigned, but complete catalog list or database is missing</li> <li><input type="checkbox"/> Catalog numbers not used</li> <li><input type="checkbox"/> No archives finding aid</li> <li><input type="checkbox"/> No duplicate copy made of associated records</li> </ul> <p>Comments:</p>

<p><b>Label</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Label specimens directly if feasible. <ul style="list-style-type: none"> <li><input type="checkbox"/> Isolating base coat used</li> <li><input type="checkbox"/> Specimen # applied in indelible ink</li> <li><input type="checkbox"/> Isolating topcoat is used</li> </ul> </li> <li>• Use only archival quality materials – no white correction fluid or nail polish.</li> <li>• If indirect labels are necessary, they can be adhered, tied, or placed loose on acid-free paper inside the artifact storage container.</li> <li>• Label all artifact containers and all storage units or containers.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Labels are present, however, non-archival materials are used</li> <li><input type="checkbox"/> Labels are present on only a portion of the collection</li> <li><input type="checkbox"/> No labels are used for the artifacts, but they are present on containers</li> <li><input type="checkbox"/> No labels are present</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Label paper directly if feasible. Labels may be produced by direct labeling in indelible ink or with a #3 graphite pencil.</li> <li>• Label photographic media. <ul style="list-style-type: none"> <li><input type="checkbox"/> Foil-back archival labels used</li> <li><input type="checkbox"/> Labels written directly on photo sleeve or envelope</li> </ul> </li> <li>• Attach labels to audiovisual and electronic media.</li> <li>• Adhesive archival labels (generally, foil-backed) may be printed using a laser printer.</li> <li>• Place in an archival quality document container suitable for each media. <ul style="list-style-type: none"> <li><input type="checkbox"/> Acid-free, lignin-free file folders, boxes, or photo sleeves used</li> <li><input type="checkbox"/> Boxes should not be glued or of metal construction</li> </ul> </li> <li>• Label box, folder, and other cross-referencing tools using above referenced methods.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Labels are present, however, non-archival materials are used</li> <li><input type="checkbox"/> Labels are present on only a portion of the collection</li> <li><input type="checkbox"/> No labels are used for the artifacts, but they are present on containers</li> <li><input type="checkbox"/> No labels are present</li> </ul> <p>Comments:</p>

<p><b>Conserve (79.11)</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Perform initial condition assessment upon receipt of collection.</li> <li>• Prioritize conservation needs.</li> <li>• Perform treatments as necessary.</li> <li>• Maintain records of all treatments of individual objects</li> <li>• Cross-index the conservation records to the master catalog so that all information concerning an object is centrally located.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Conservation treatments not required</li> <li><input type="checkbox"/> Conservation methods not employed</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Perform initial condition assessment upon receipt of collection and complete preservation worksheet for associated documentation.</li> <li>• Identify and prioritize conservation needs and treatments to ensure physical survival of materials.</li> <li>• Maintain records of all treatments performed. <ul style="list-style-type: none"> <li><input type="checkbox"/> Treatments can also be recorded in an electronic system so that all information on a specific collection of associated documentation may be readily identified and reported.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Conservation treatments not required</li> <li><input type="checkbox"/> Conservation methods not employed</li> </ul> <p>Comments:</p>

<p><b>Complete and Accurate Records (79.9(b)(1))</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Records generated for the curation of archaeological materials which must be maintained by the repository include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Acquisition or accession records</li> <li><input type="checkbox"/> Catalogs and inventory lists</li> <li><input type="checkbox"/> Collection condition records and conservation treatments performed</li> <li><input type="checkbox"/> Loan information</li> <li><input type="checkbox"/> Inspection records</li> <li><input type="checkbox"/> Records on lost, deteriorated, damaged, or destroyed property</li> <li><input type="checkbox"/> Records of destructive analysis conducted on specimens</li> <li><input type="checkbox"/> Deaccession, transfer, repatriation, discard records</li> <li><input type="checkbox"/> Records documenting the physical location of the material remains (i.e., shelf addresses, loan agreements, and materials on exhibit)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Records contain incomplete data</li> <li><input type="checkbox"/> Records not present/missing</li> <li><input type="checkbox"/> Records never generated</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Records that must be maintained by the repository for archaeological materials also apply to all associated documentation.</li> <li>• In addition to maintaining records documenting the collection within the repository, any materials that were compiled, created or generated during an archaeological investigation are considered to be associated documentation for the collection and must be preserved following the guidelines outlined above.</li> <li>• Associated project documentation may include, but is not limited to: <ul style="list-style-type: none"> <li><input type="checkbox"/> Field notes</li> <li><input type="checkbox"/> Site forms</li> <li><input type="checkbox"/> Draft and final reports</li> <li><input type="checkbox"/> Analysis records</li> <li><input type="checkbox"/> Administrative records</li> <li><input type="checkbox"/> Maps and other locational information</li> <li><input type="checkbox"/> Photographic materials</li> <li><input type="checkbox"/> Survey records</li> <li><input type="checkbox"/> Results of literature searches</li> <li><input type="checkbox"/> Background material or historical data gathered or generated during the investigation</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Records contain incomplete data</li> <li><input type="checkbox"/> Records not present/missing</li> <li><input type="checkbox"/> Records never generated</li> </ul> <p>Comments:</p>

<p><b>Storage (79.9 (b)(2))</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Storage areas should be physically separate from: <ul style="list-style-type: none"> <li><input type="checkbox"/> Offices</li> <li><input type="checkbox"/> Research areas</li> <li><input type="checkbox"/> Conservation areas</li> <li><input type="checkbox"/> Registration activities</li> <li><input type="checkbox"/> Any other area used for non-storage function</li> </ul> </li> <li>• Access should be restricted and monitored.</li> <li>• Lights should remain off unless personnel are in the storage area.</li> <li>• No food or beverages should be brought into the storage area.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Storage areas are also used for non-curatorial purposes</li> <li><input type="checkbox"/> Access to storage areas is not limited</li> <li><input type="checkbox"/> There is no dedicated storage space</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Storage areas for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Storage areas are also used for non-curatorial purposes</li> <li><input type="checkbox"/> Access to storage areas is not limited</li> <li><input type="checkbox"/> There is no dedicated storage space</li> </ul> <p>Comments:</p>

**Structural Adequacy (79.9(b)(3)(I))**

Archaeological Materials

- Repository should meet all building codes:
  - Local
  - County
  - State
  - Federal
- The repository should be inspected on a regular schedule, as required by local, county, or state regulations.
- Additionally, a building and storage inspection for structural soundness should occur :
  - Once every five years for buildings less than 10 years of age
  - Once every three years for any building older than ten years of age

- Meets standards
- Facility does not meet one or more building codes
- Facility not inspected on required schedule
- Facility not inspected on recommended schedule

Comments:

Associated Documentation

- Structural adequacy needs for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.

- Meets standards
- Facility does not meet one or more building codes
- Facility not inspected on required schedule
- Facility not inspected on recommended schedule

Comments:

**Fire Detection  
and Suppression  
(79.9 (b)(3)(ii))**

	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Repository should meet all building codes: <ul style="list-style-type: none"> <li><input type="checkbox"/> Local</li> <li><input type="checkbox"/> County</li> <li><input type="checkbox"/> State</li> <li><input type="checkbox"/> Federal</li> </ul> </li> <li>• The repository should be inspected on a regular schedule, as required by local, county, or state regulations.</li> <li>• The repository, particularly the storage areas, should be inspected a minimum of twice yearly by certified fire officials.</li> <li>• Minimally, fire alarms and ABC-designated fire extinguishers should be placed throughout the storage area(s).</li> <li>• Fire detection system (i.e., heat and smoke sensors) should be wired into the local fire department.</li> <li>• Dry-pipe zoned fire suppression sprinkler system is recommended for storage area(s).</li> <li>• A Halon fire suppression system is <u>not</u> recommended.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Facility does not meet one or more building codes</li> <li><input type="checkbox"/> Facility not inspected on required schedule</li> <li><input type="checkbox"/> Facility not inspected on recommended schedule</li> <li><input type="checkbox"/> Facility does not have functional detection system</li> <li><input type="checkbox"/> Facility does not have functional suppression system</li> <li><input type="checkbox"/> Facility does not maintain recommended detection and suppression systems</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Fire detection and suppression needs for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.</li> <li>• All repository-generated documentation of actions taken or performed upon specimens (see above section, Maintain complete and accurate records) should be stored in cabinets that are securable, insulated, and provide protection against fire, smoke and water damage.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Facility does not meet one or more building codes</li> <li><input type="checkbox"/> Facility not inspected on required schedule</li> <li><input type="checkbox"/> Facility not inspected on recommended schedule</li> <li><input type="checkbox"/> Facility does not have functional detection system</li> <li><input type="checkbox"/> Facility does not have functional suppression system</li> <li><input type="checkbox"/> Facility does not maintain recommended detection and suppression systems</li> </ul> <p>Comments:</p>

<p><b>Security</b> <b>(79.9(b)(3)(6)(8))</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Repository must meet local safety codes.</li> <li>• Install motion and sound detectors in the collections' storage area and connect detectors to a private security company or local police.</li> <li>• Extremely rare or monetarily valuable items should be kept in a secure location such as a safe, vault, or securable cabinet, that is environmentally sound (i.e., temperature and humidity levels can be monitored and maintained).</li> <li>• Access to the collections area should be limited to individuals who have direct daily business in the facility (e.g., curator of collections).</li> <li>• The storage facility should be inspected a minimum of once a month for any faults or lapses in security.</li> <li>• Although not specified in 36 CFR Part 79, it is recommended that the following security measures should also be taken: <ul style="list-style-type: none"> <li><input type="checkbox"/> Install deadbolt locks on all interior and exterior doors and windows leading to the collections storage area.</li> <li><input type="checkbox"/> Illuminate exterior of the storage facility with security lights.</li> <li><input type="checkbox"/> Grounds should also be patrolled by security officials, when staff are not present.</li> <li><input type="checkbox"/> The locks or security codes should be changed if any individual had access to the collections storage area and is no longer employed at the repository.</li> <li><input type="checkbox"/> Visiting scholars to the collections area should be monitored at all times and a record of the items they used should be maintained and checked prior to their departure.</li> <li><input type="checkbox"/> Regular inspections of a sample of all collections should be conducted at least twice a year to determine whether any items are unaccounted.</li> </ul> </li> <li>• A written policy concerning these topics should be generated and updated to reflect changes in general museum policy and industry standards.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Facility does meet local safety codes.</li> <li><input type="checkbox"/> Facility does not maintain intrusion and detection systems.</li> <li><input type="checkbox"/> Facility and collections are not inspected on a regular schedule</li> <li><input type="checkbox"/> Valuable materials are not protected with extra security measures.</li> <li><input type="checkbox"/> Access to collections is not monitored.</li> </ul> <p>Comments:</p>
--	-------------------------------------	---	--

	Associated Documentation	<ul style="list-style-type: none"> <li>• Security measures for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.</li> <li>• All repository-generated documentation should be duplicated. The safety copy should be stored in a separate location. Copies must be made of: <ul style="list-style-type: none"> <li><input type="checkbox"/> Site forms</li> <li><input type="checkbox"/> Artifact inventory lists</li> <li><input type="checkbox"/> Accession records</li> <li><input type="checkbox"/> Any files on computer disks and tapes</li> </ul> </li> <li>• A duplicate or safety copy, of the project-generated associated documentation (see above) should be created on acid-free paper or archival microfilm, and stored in a safe and separate location if possible.</li> <li>• Records should be stored in a locking cabinet, safe, or vault to protect them from theft.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Facility does meet local safety codes.</li> <li><input type="checkbox"/> Facility does not maintain intrusion and detection systems.</li> <li><input type="checkbox"/> Facility and collections are not inspected on a regular schedule</li> <li><input type="checkbox"/> Valuable materials are not protected with extra security measures.</li> <li><input type="checkbox"/> Access to collections is not monitored.</li> <li><input type="checkbox"/> Safety copies of all records do not exist.</li> </ul> <p>Comments:</p>
--	--------------------------	--	---

**Emergency Management Plans (79.9(b)(3))**

Archaeological Materials

- The Emergency Plan should establish procedures for responding to:
  - Fires
  - Floods
  - Natural Disasters
  - Civil Unrest
  - Acts of violence
  - Structural failures
  - Mechanical systems' failures
- It is recommended that the plan incorporate the services and facilities available locally from city, county or state emergency agencies.
- All staff responsible for executing the emergency plan should receive annual training in implementing the plan.
- Periodic (no less than once a year) review of the emergency management plans should be carried out.

- Meets standards
- Emergency Management Plan does not address all events listed
- Emergency Management Plan is in draft form
- An emergency plan only exists as an informal, unwritten
- No Emergency Management Plan exists

Comments:

Associated Documentation

- The Emergency Management Plan for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.

- Meets standards
- Emergency Management Plan does not address all events listed
- Emergency Management Plan is in draft form
- An emergency plan only exists as an informal, unwritten
- No Emergency Management Plan exists

Comments:

<p><b>Qualified Museum Professional (79.9(b)(4))</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Minimally, a repository should staff: <ul style="list-style-type: none"> <li><input type="checkbox"/> One full-time curator</li> <li><input type="checkbox"/> One full-time collections manager</li> <li><input type="checkbox"/> Have access to a professional conservator</li> </ul> </li> <li>• These personnel should meet the minimum qualifications as outlined in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716, September 29, 1983).</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Full-time curator not on staff</li> <li><input type="checkbox"/> Full-time collections manager not on staff</li> <li><input type="checkbox"/> Staff do not meet professional qualifications</li> <li><input type="checkbox"/> No dedicated staff for archaeological collections management</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Minimally, we recommend that a repository should staff, or have access to: <ul style="list-style-type: none"> <li><input type="checkbox"/> Professional archivist</li> <li><input type="checkbox"/> Conservator</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> Full-time archivist not on staff</li> <li><input type="checkbox"/> Full-time conservator not on staff</li> <li><input type="checkbox"/> Staff do not meet professional qualifications</li> <li><input type="checkbox"/> No dedicated staff for archaeological collections management</li> </ul> <p>Comments:</p>

<p><b>Environmental Controls (79.9(b)(5)(ii))</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Collections must be protected from deterioration from: <ul style="list-style-type: none"> <li><input type="checkbox"/> Adverse temperature and relative humidity levels</li> <li><input type="checkbox"/> Visible light</li> <li><input type="checkbox"/> Ultraviolet (UV) radiation</li> <li><input type="checkbox"/> Dust</li> <li><input type="checkbox"/> Soot</li> <li><input type="checkbox"/> Gases</li> <li><input type="checkbox"/> Mold</li> <li><input type="checkbox"/> Fungus</li> </ul> </li> <li>• A heating, ventilating, and air conditioning (HVAC) system is recommended for a storage area to maintain adequate storage temperature (55-70<sup>o</sup> F) and relative humidity levels (30-50%).</li> <li>• If a HVAC is not economically feasible, then portable humidifiers and de-humidifiers can be employed to help maintain relative humidity levels.</li> <li>• Hygrothermographs or thermohygrometers should be used to monitor temperature and relative humidity levels.</li> <li>• Keeping excessive temperature and high humidity levels down will prevent the growth of mold and fungus.</li> <li>• Install filters on vents coming into the collections storage area to keep dust and soot levels down.</li> <li>• Filters should be monitored and replaced at regular intervals or when needed, whichever occurs first.</li> <li>• Ideally, there should be no windows in the collections storage area, thereby eliminating UV sunlight from damaging collections. If windows exist, the use of blinds, shades, filters and/or curtains will help to reduce the amount of UV light.</li> <li>• UV filters can be applied on overhead lights; these must be changed routinely (annually) to be effective. Low wattage light bulbs can be used inside the collections storage area as well.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> HVAC not present in collections storage areas</li> <li><input type="checkbox"/> Temperature and humidity levels are not monitored</li> <li><input type="checkbox"/> Temperature and humidity levels are not maintained</li> <li><input type="checkbox"/> Collections are exposed to dust and soot</li> <li><input type="checkbox"/> Mold and fungus are present in collections storage area</li> <li><input type="checkbox"/> Windows are present in collections storage area</li> <li><input type="checkbox"/> Windows and overhead lights are not UV filtered</li> </ul> <p>Comments:</p>
---	---------------------------------	---	---

	Associated Documentation	<ul style="list-style-type: none"><li>• Environmental controls for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.</li></ul>	<ul style="list-style-type: none"><li><input type="checkbox"/> Meets standards</li><li><input type="checkbox"/> HVAC not present in collections storage areas</li><li><input type="checkbox"/> Temperature and humidity levels are not monitored</li><li><input type="checkbox"/> Temperature and humidity levels are not maintained</li><li><input type="checkbox"/> Collections are exposed to dust and soot</li><li><input type="checkbox"/> Mold and fungus are present in collections storage area</li><li><input type="checkbox"/> Windows are present in collections storage area</li><li><input type="checkbox"/> Windows and overhead lights are not UV filtered</li></ul> <p>Comments:</p>
--	--------------------------	--	--

<p><b>Pest Management (79.9(b)(5)(ii))</b></p>	<p>Archaeological Materials</p>	<ul style="list-style-type: none"> <li>• Use an Integrated Pest Management (IPM) program to monitor collections for signs of infestation</li> <li>• Treat infestations as they occur. <ul style="list-style-type: none"> <li><input type="checkbox"/> Do not routinely spray or use chemical treatments if no infestation is evident.</li> <li><input type="checkbox"/> Isolate infested objects</li> <li><input type="checkbox"/> Treat the objects and the affected portion of the storage area.</li> <li><input type="checkbox"/> Use freezing as an alternative to chemical treatment of infestations.</li> </ul> </li> <li>• Focus on preventive care: identify how pests enter the repository, what they are consuming, and how to eliminate the specific pest.</li> <li>• Use sticky traps to monitor insect infestation and set mouse traps for rodents. Inspect the traps routinely (at least monthly).</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> IPM is in draft form only</li> <li><input type="checkbox"/> Facility does not have a written IPM</li> <li><input type="checkbox"/> Informal procedures are followed on a regular basis</li> <li><input type="checkbox"/> Informal procedures are followed on an as-needed basis</li> <li><input type="checkbox"/> No measures are taken for pest management</li> </ul> <p>Comments:</p>
	<p>Associated Documentation</p>	<ul style="list-style-type: none"> <li>• Pest Management needs for associated documentation should follow the same Required Actions referenced above for Archaeological Materials.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Meets standards</li> <li><input type="checkbox"/> IPM is in draft form only</li> <li><input type="checkbox"/> Facility does not have a written IPM</li> <li><input type="checkbox"/> Informal procedures are followed on a regular basis</li> <li><input type="checkbox"/> Informal procedures are followed on an as-needed basis</li> <li><input type="checkbox"/> No measures are taken for pest management</li> </ul> <p>Comments:</p>