

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

January 18, 2001

In Reply Refer To:
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EMS TRANSMISSION 01/23/2001
Instruction Memorandum No. 2001-066
Expires: 09/30/2002

To: All Field Officials

From: Director

Subject: Treatment of Museum Collections in Bureau of Land Management
(BLM) Offices

Program Area: Museum Collections Management

Purpose: This Instruction Memorandum (IM) establishes policy for the treatment of museum collections, principally those in Field Offices, which originate from BLM administered lands.

Policy/Action:

Collections Storage Policy

Because of the unique, non-renewable character of museum objects and collections, and that the requirements for proper curation of collections are extremely intensive and which no BLM Field Office is equipped to carry out, it is the policy of the BLM that **no museum collections will be stored in BLM offices.**

Also, until Native American Graves Protection and Repatriation Act (NAGPRA) materials are repatriated, they are considered museum collections and treated as such. Due to the sensitive nature of NAGPRA materials, no NAGPRA materials will be stored in BLM offices.

Clearly, the three BLM curation facilities, Anasazi Heritage Center, Billings Curation Center and the National Historic Oregon Trail Center, are the exceptions to these policies. The only other exceptions are collections that are part of an ongoing law enforcement case.

Any museum collections currently located in Field Offices are to be transferred to an established professional curation facility which will accession and catalog them. If BLM staff require artifacts for research, they should conduct the research at the curation facility or, if that is not possible, obtain the

artifacts under a temporary loan from the curation facility after they have been accessioned. During the loan period, the BLM office must be equipped to provide proper curation of the materials in the manner outlined in Departmental Manual 411 (DM 411).

Any materials listed under the definition of non-museum collections (Attachment 1) may be maintained in Bureau Field Offices.

Donation Acceptance Policy for Museum Collections

Members of the public may have museum objects or collections they wish donate to BLM. Because museum collections carry an extensive fiscal and management burden, with the exception of the three BLM curation facilities, BLM Field Office employees should discourage donations. Perspective donors should be encouraged to donate collections to a local museum, historical society or university. No donations of collections which originated from non-BLM lands may be accepted. Donations of collections which originated from BLM administered lands may only be accepted if there is clear provenience and the material can be documented to have been collected in a professional manner in accordance with applicable laws and regulations. Under no circumstances may a donation be accepted that carries any stipulations, restrictions, riders or conditions tied to the donation. If the material in question falls outside of the definition of true museum collections, they may be accepted as any other donation of personal property, according to the provisions which govern such donations.

Under no circumstances may BLM personnel accept the donation of any NAGPRA materials originating from non-BLM administered lands. These materials are very sensitive and carry with them extensive responsibilities for determining proper ownership. Donations of NAGPRA materials may be accepted only if it can be clearly documented they originated from BLM administered lands and there is accompanying archaeological provenience.

Changes in Cultural Resource and Paleontological Permits Policy

The Office of Inspector General (OIG) Report No. 99-I-808, recommended that BLM, "Ensure that the Bureau's revised Collections Management Plan includes procedures for permittee and repository confirmation to the Bureau of receipt of Federal (Bureau) collections, including a brief description of the collected objects." To comply with this recommendation, cultural resource and paleontological permits must now include a requirement that the permittee provide the BLM with a Confirmation of Museum Collections Deposition Statement (Attachment 2) signed by an authorized curation facility official confirming the date of deposition, type, number and condition of the collected museum objects deposited at the facility. An existing curation facility collections receiving form may be substituted if it minimally includes all of the information required in Attachment 2. Collections from each project must be listed separately.

Updating Museum Collections Status

A number of Field Offices identified materials as "Museum Property" or "Museum Collections" during the 1991 and/or 1993 inventories of museum collections conducted by the Department's Office of

Property, Acquisition and Management. A number of these objects were mistakenly identified. Most of the objects identified fall under various categories of non-museum collections. In an effort to reconcile these inventories and document the location of collections, all Field Offices must complete a "Statement of Museum Collections Status" (Attachment 3), signed by the Field Manager and sent to the National Curator. Prior to completing a "Statement of Museum Collections Status," Attachment 1- Museum Collections, Definitions, should be reviewed carefully.

If museum collections are **not present** in a Field Office, a "Statement of Museum Collections Status" shall be completed with Statement 1 checked and the document forwarded to the National Curator.

If collections **are present** in a Field Office, a "Statement of Museum Collections Status" shall be completed with Statement 2 checked with the name of the repository and an estimated time frame for the collections transfer to the named repository filled out with an attached list of the museum collections currently held in that office. The attached list shall include the type (i.e., archaeological, historic, paleontological), numbers and condition of objects. The document shall be forwarded to the National Curator. Once these office collections have been transferred to the appropriate curation facility, documentation shall be sent to the National Curator, with the name and address of the facility and a summary of the objects transferred. If offices do require the materials for research or display, they may have them loaned back from the curation facility after they have been accessioned, following the loan regulations of the individual facility. However, offices may only do so if they are equipped to curate the material in the manner outlined in DM 411.

Time frame: This IM is effective upon receipt.

Budget Impact: The application of this policy should have a positive impact on budget by helping ensure that guidance is clear, consistent and unnecessary museum collections obligations are not taken on by the BLM.

Background: The OIG conducted an audit on cultural resource management in the BLM. The final report ("Cultural Resource Management, Bureau of Land Management," Report No. 99-I-808, September 3, 1999) found that "...the Bureau did not adequately control and account for its museum collections," and "consequently, the Bureau had little assurance that its museum collections were adequately managed." In line with OIG audit recommendations, appropriate laws and regulations and professional standards, this IM is being issued to establish policies dealing with the treatment of museum collections which originated from BLM administered lands.

Manual Sections Affected: Manual sections 8120 and 8130 are affected by this policy.

Coordination: This document was coordinated with WO 200, 800, Anasazi Heritage Center, Billings Curation Center, National Historic Oregon Trail Center and all State Offices.

Contact: Any question regarding this IM may be addressed to Dr. Stephanie Damadio, National Curator, (916) 978-4650.

Signed by:
Henri R. Bisson
Assistant Director
Renewable Resources & Planning

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

3 Attachments

- 1 - Museum Collections, Definitions, Bureau of Land Management (2 pp)
- 2 - Bureau of Land Management Confirmation of Museum Collections Deposition Statement (1 p)
- 3 - Bureau of Land Management Field Office Statement of Museum Collections Status (1 p)

Museum Collections

Definitions

Bureau of Land Management

There is no single definition for what constitutes a museum object or collection. Defining an article as a museum object is highly dependent on the mission of the agency, museum or facility making the determination. The first Coca Cola bottle would be a significant museum object to an industrial glass museum, but of no interest to a paleontological museum, for example. A case by case decision is necessary to decide which objects should be considered museum objects.

Generally, BLM museum collections consist of objects and materials that preserve a significant part of the Nation's heritage and are essential in the study of the social sciences and humanities. They may be used in exhibits, research and education programs. They are selected for preservation according to established professional standards and pursuant to legal requirements. Some, but not all, of the attributes that may be used for identifying museum objects include:

- scientific or academic value
- a tendency to appreciate in value
- generated through systematic research on public lands
- association with an eminent figure, significant event or resource
- age greater than 50 years
- rarity or uniqueness
- representativeness of a time, place and/or culture

Most museum objects will have more than one, if not several, of these attributes.

Currently, BLM museum collections consist of approximately 3.5 million objects or lots in BLM facilities and millions of objects located in approximately 190 external facilities. These objects are principally archaeological and historical materials (material remains of past human life and activities such as human skeletal remains, wood, pottery, leather, textiles, glass, paper, photographs and negatives, stone and metal tools, weapons and decorative objects, portions of structures and plant remains to name a few) and paleontological materials (fossilized portions or traces of prehistoric plants and animals from past geological periods). Bureau museum collections may consist of one object, several objects, curatorial lots (i.e. fragments of an object or objects), and non-artifactual materials such as soil and carbon samples. Associated records, though not museum objects, are part of a museum collection.

Museum collections or objects have been referred to on occasion as "museum property." This term is confusing and misleading and is never used in museum sciences terminology. Also, as museum collections have never been in any BLM "property" system, all references to these kinds of objects will be to "museum collections" or "museum objects."

Non-museum collections

Whether materials identical in appearance are defined as museum collections or other materials depends on the ultimate function of the material, the long-term preservation goals and the Bureau's mission. Materials not considered museum collections include: site records, maps, reference books, manuals, brochures and other documents, regardless of age, which are still consulted (even if only occasionally); library materials; study skins of birds and small mammals; mounts (mounted animals); botanical specimens (such as pressed or dried specimens); unprovenienced/incidental finds of faunal, geological, paleontological, historic (tin cans, iron work) or archaeological specimens (ceramic pots, pottery shards, stone tools) lacking scientific context or scientific merit or information (turned in by the public); specimens and samples used for ongoing research intended to be consumed in analysis or that can be readily replaced; material made or acquired and preserved solely for reference, interpretive or exhibit purposes; materials obtained or purchased for decorative, educational, outreach, interpretive or exhibit purposes; mass produced commercial items; casts of objects; reproductions of historic photographs or documents; and, abandoned farming or mining equipment on acquired lands. The aforementioned are not museum collections because they are working files, type/study collections, decorative items, expendable educational, outreach, interpretive or exhibit materials, school, reference or working collections, or discarded objects. Museum display cases, lighting, graphics, or commercial replicas are not part of collections. Museum records created to manage collections (i.e. accession, catalog, loan and inventory records), are also not part of collections.

Non-museum collections should be used for educational or instructive purposes outside of a curation facility. True museum collections may be used for these purposes when they are under temporary loan from a curation facility provided proper care is provided in the manner outlined in DM 411.

**Bureau of Land Management
Confirmation of Museum Collections' Deposition Statement**

Instructions

1. A "Confirmation of Museum Collections' Deposition Statement" must be completed for all museum collection originating from BLM administered lands which are being deposited at a curation facility. An existing curation facility collections receiving form containing the same information may be substituted.
2. All information requested on the form must be completed. Permittees must provide a list of the objects to be deposited attached to this, or a substitute curation facility form. The list must minimally contain information on the type (i.e., archaeological, historic, paleontological), number and condition of objects. After this form has been signed by the curation facility official, the original with the list of objects is to be mailed to the BLM State Archaeologist.
3. A curation facility official must acknowledge receipt of the collection with a signature. Before signing, the curation facility official should compare the list of objects attached here to the actual objects being deposited.

Permittee Information

Permit number: _____

Permittee name: _____
(Please print and sign name)

Address: _____

Telephone Number: _____

Project Name and Number: _____

Curation Facility Information

Curation Facility Official: _____ (name & title printed)

Curation Facility Name: _____

Curation Facility Address: _____

Curation Facility Contact Name: _____

Curation Facility Phone Number: _____

Receipt of Collection Statement

I, _____ (Curation Facility Official Signature) certify that the _____ (name of facility) has on this date, _____, accepted the museum collections or museum objects described on the attached _____ (number of pages) pages from _____ (name of individual transporting the collection).

Bureau of Land Management Field Office

Statement of Museum Collections Status

Instructions

1. Each BLM Field Office must complete a Statement of Museum Collections Status.
2. After reading IM 2001-066, "Treatment of Museum Collections in BLM Offices" and consulting with appropriate State or Field Office special lists, each Field Office must complete one of the statements below.
3. Field Offices holding **no** museum collections must check Statement 1 and return the completed form to Dr. Stephanie Damadio, National Curator, Bureau of Land Management, 2800 Cottage Way, Sacramento, CA 95825 or CASO.
4. Field Offices **holding** museum collections must check Statement 2 and return the completed form to the address above along with an attached list of the museum collections currently held in that office. The attached list must include the type (archaeological, historic, paleontological), number and condition of museum objects. An update of collections status will be sent to the National Curator once the collections have been transferred.

Field Office: _____

Address: _____

Telephone Number: _____

Statement Completed By: _____
(Name, Title, Date - please print)

Statement Approved By: _____
(Field Manager Name, Title - please print)

(Signature of Field Manager, Date Signed)

Statement

1. _____ I certify that this BLM Field Office does **not** hold objects which would fall under the definition of museum collections or objects.

2. _____ I certify that this BLM Field Office **does** hold objects which would fall under the definition of museum collections or objects. A list of those collections or objects is attached. The objects currently present in this office will be transferred to (name of curation facility)

_____ in the next (number of months) _____ months at which time we will send a copy of a document signed by an authorized curation facility official which confirms the date and general description of the collections deposited at the curation facility.