

National Museum of Natural History Collections Management Policy

September, 2006

I. Preamble

The National Museum of Natural History (NMNH) is dedicated to the study of the natural world, including humans and human cultures. As part of the larger Smithsonian mission, the NMNH is committed to the increase of knowledge and to disseminating that knowledge to the public. This mission requires a strong foundation, built on basic research in natural history and anthropology. Within the museum context, such research is intimately tied to collections, as objects of research and as representations of the biotic and abiotic history of the Earth and beyond.

Smithsonian collections are essential for achieving the Institutional mandate for the increase and diffusion of knowledge. The quality, breadth and diversity of these national treasures form the foundation on which our unequaled scientific and educational institution is built. The collections of the National Museum of Natural History comprise the majority of the Smithsonian's collections, both in scope and in size, representing over 90% of the Institution's collections. These collections serve as primary reference materials for exploring and understanding the solid Earth and planet, biological and cultural diversity, evolutionary relationships, biological conservation, and global change. They help us to interpret our biological origins, our cultural heritage, and what the future may hold.

The special resources allow the museum to make unique contributions to answering significant scientific questions and responding to national mandates, priorities, and concerns. As such, the collections play a vital role in advancing scientific knowledge, addressing societal issues, and increasing the scientific literacy of our nation. These continually consulted reference collections also provide critical information links to other collections throughout the world, establishing the NMNH as an important international user facility.

The collections are international in scope and diverse in kind. They range from DNA to cultural artifacts, from microfossils to elephant skulls, from stone tools to meteorites. In total, the NMNH counts millions of collection items and associated archival materials among its holdings, and recognizes a responsibility to preserve and provide access to those items in the service of science. The collections constantly grow as the scientific knowledge-base changes and matures, and as research programs and the needs of researchers change. New collections build on old ones, reflect changing norms of research excellence, and add needed objects in the service of scientific inquiry.

According to statute (Sundry Civil Act of March 3, 1879 [20 USC § 59]), NMNH serves as a repository for collections made by or on behalf of other Federal agencies and entities. These collections are managed under the same policies and standards of

stewardship as all other NMNH collections, under the terms of the agreements establishing the repository arrangement.

The NMNH is committed to long-term stewardship of the collections and to supporting their use by scientists and the general public. This stewardship role is unique among other US natural history museums because it is federally mandated. As the nation's natural history museum, the NMNH has a mandated commitment to conserve and protect its collections in a manner that will assure their continued accessibility by future generations, to hold them in trust, resisting short-term trends or opportunistic uses in order to ensure fulfillment of their long-term potential. In this sense, the staff charged with the care and study of this national treasure serve as trustees of the collections and keepers of the NMNH's mission.

The public outreach efforts of the NMNH are based on the collections and the knowledge gained from them. The NMNH's well-deserved reputation for excellence in public education is in no small part an outgrowth of well cared for collections and the scientific infrastructure needed to ensure that care.

A. Purpose

This document establishes policies and guidance for the acquisition, management, and use of the NMNH's collections.

B. Definitions

Affiliated Agencies are resident groups of staff from Federal agencies having a formal agreement and logical connection to NMNH. Typically, those agencies include the US Department of Agriculture (USDA), US Geological Survey (USGS), National Oceanic and Atmospheric Administration (NOAA), National Marine Fisheries Service (NMFS), and Walter Reed Biological Unit, US Department of Defense (WRBU).

Collections management is the deliberate development, maintenance, preservation, documentation, use and disposition of collections. Collections include objects, natural specimens, representational samples, artifacts, information about and derived from such holdings, and other items that are acquired, preserved and maintained for public exhibition, education, and study.

A **Collections Management Policy (CMP)** is a document that provides guidelines so that decisions concerning collections are prudent, responsible, informed, and in accordance with NMNH's mission. A policy ensures collections are responsibly developed, maintained, exhibited, used, and preserved. Policy is separate and distinct from the procedures and mechanisms used to implement policy.

Collecting units are any organizational groupings approved by the Director to acquire collections for scientific, archival or educational use for the museum.

Collections are objects, specimens and artifacts animate or inanimate, and their associated information, or certain compilations of data that act as proxy for items that cannot be collected, which are acquired with purpose, maintained in an orderly manner, and managed in the public trust for the purposes of research, documentation, exhibition, and education. Collections can be comprised of an individual **item**, in the form of an individual sample, a specimen that is animate or inanimate, an object, artifact, and archival holding. The minimal unit that can be logged for tracking or documentation purposes is the **item**. Collections may also be comprised of a **lot** or grouping of similar or related items. When collections are organized in **lots**, the **lot** is the meaningful unit for tracking and documentation.

A collections plan is a written document, approved by the Director, which guides the content of the collections and leads staff in a coordinated and uniform direction over time to refine and expand the value of the collections in a predetermined way. A collections plan provides a rationale for the collections and collecting and the context for decision-making regarding acquisition, deaccessioning, resource allocation, partnership with other institutions, and other aspects of building and sustaining the collections in relation to the unit's overall mission and goals. The process of collections planning determines what a collecting unit should be collecting, what it will retain, material appropriate for deaccessioning, and the required resources to implement the plan. A collections plan ensures logical, responsible collections growth by establishing well-defined goals and priorities that guide collecting activities based on a unit's mission, strategic plan, and programmatic activities.

Collections Advisory Committees are appointed by the collecting unit chair or head. They can provide a variety of services, including development, implementation and compliance with collections management policy at the collecting unit level, advising on collection transactions, among other duties.

The Collections Committee is a museum-wide advisory body to the Director or designee. Members of this committee are drawn from staff having a direct responsibility for the collections. The committee's duties include periodic review and updating of the NMNH collections management policy and an annual review of museum compliance with NMNH and Smithsonian policy mandates.

Smithsonian Directive 600 (SD 600) is the Smithsonian's collections management policy. It is complemented by the ***SD 600 Implementation Manual***, which provides technical guidance, advice, and information to assist collecting units in achieving the standards and implementing the policies set forth in this directive.

C. Background

The NMNH develops, maintains, preserves, researches, interprets, exhibits, and, in the case of living plants and animals, propagates, collections of artifacts and natural specimens. The acquisition, preservation, management, and study of collections are fundamental to the NMNH's mission and have been the foundation upon which its reputation rests. Initially assembled over 160 years ago, the national collections are central to many of the core activities and to the vitality and significance of the NMNH

and Smithsonian. Collections serve as an intellectual base for scholarship, discovery, exhibition, and education. Collections also provide content for Smithsonian ventures such as publishing, licensing, and media projects.

The collections have been amassed primarily through research activities of the staff and colleagues, as well as through gifts from organizations and individuals. Significant parts of the collections were transferred from other institutions and agencies, where they were assembled in support of research. Collecting is planned and focused by questions of scientific importance. In some cases, collections were acquired specifically to enlarge or improve NMNH holdings in certain areas.

Each collecting unit maintains its own unique collection, purpose, character, and role in achieving the Smithsonian's mission of the "increase and diffusion of knowledge." Among the vast collections are irreplaceable icons of the nation, examples of common life, and scientific material vital to the study of the world's natural and cultural heritage. NMNH collections represent a diverse range of materials and disciplines, including natural and physical science specimens, living animals and plants, images, archives, libraries, audio and visual media, and their associated information. Together, they preserve the past, increase our understanding of diverse human cultures, and the natural world in which we live, and support the research that expands human knowledge in science. The scope, depth, and unparalleled quality of these collections make it imperative to ensure that they are properly preserved and made accessible for current and future generations for research, education, and enjoyment.

The Act of August 10, 1846 [20 USC § 41] established the Smithsonian and vested authority for management of the Institution in a Board of Regents. The Act establishes stewardship responsibility for collections.

In the Sundry Civil Act of March 3, 1879 [20 USC § 59], the following responsibility is charged:

"All collections of rocks, minerals, fossils, and objects of natural history, archaeology and ethnology, made by the National Ocean Survey, the United States Geological Survey, or by any other parties of the Government of the United States, when no longer needed for investigation in progress shall be deposited in the National Museum."

D. Applicability

This policy applies to all NMNH collecting units that have delegated authority to acquire, manage, and use collections and collections information. All NMNH staff and affiliated agency staff who are officially stationed at the NMNH, volunteers, fellows, and others with delegated collections management responsibilities or access to collections are required to adhere to the collections management policies, procedures, and practices established in this document.

The acronym NMNH is used to refer to the National Museum of Natural History, Smithsonian Institution, including all of its constituent facilities. When these are dealt

with separately, the following acronyms may be used: NHB for the main Natural History Building on the National Mall; MSC for the Museum Support Center in Maryland; and NC for the Naturalists Center in Virginia.

E. Authority and Responsibility

The acquisition and possession of collections impose legal and ethical obligations to provide proper management, preservation, and use of the collections and their associated information. Authorities and responsibilities for collections management at the NMNH are subordinate to the authorities and responsibilities at the Institution level, as defined in *SD 600* and its associated *Implementation Manual*.

NMNH collections management authorities and responsibilities are delegated as follows:

1. The **Director** is responsible for:
 - 1.1. Museum policy guidance, program direction and planning, and budget support to carry out the collections management requirements established in this document.
 - 1.2. Designating authorized collecting units and assigning authority to acquire and manage collections.
 - 1.3. Final approval authority for all collections management policies, and approving exceptions to these policies.
 - 1.4. Delegating authority for the establishment, review and revision of collecting unit collections management policies.
 - 1.5. Delegating authority for collections management activities to the appropriate staff, in order to fulfill all staff responsibilities as defined in this policy.
 - 1.6. Developing and implementing a long-term collections plan that provides a framework for making collection development, acquisition, management, and disposals decisions.
 - 1.7. Requiring that each collecting unit develop a collections plan for review and approval by the Director for incorporation into the museum's collections plan.
 - 1.8. Approving proposed collecting priorities to guide the development of collections per the approved collections plan including reasonable resource need projections, and reviewing those priorities on a regular basis.
 - 1.9. Assuring compliance with *SD 600*, the *SD 600 Implementation Manual* and NMNH's collections management policy, including approval and submission of reports as required.
 - 1.10. Assuring compliance with any policies related to collections specified in bylaws of the NMNH Advisory Board or by the Board of Regents.
 - 1.11. Establishing performance measures for monitoring and reporting progress towards implementation of collections management standards.
 - 1.12. Ensuring NMNH strategic plans include collections-specific elements with performance measures, targets, and timelines.
 - 1.13. Approving the appointment of a representative Collections Committee with responsibility to advise the Director or designee on collections issues.

- 1.14. Aligning training of unit collections staff with the requirements of unit strategic plans, professional standards, job descriptions, delegated authority, and assigned responsibilities.
2. The **Associate Director for Research and Collections (ADRC)** is responsible for the following, as well as for any of the above functions that may be delegated by the Director.
 - 2.1. Recommending units for collecting unit authorization to the Director, and assigning responsibility and authority for collecting.
 - 2.2. Review of all collecting unit collections management policies, providing recommendations to Director for final approval.
 - 2.3. Reviewing all the specific delegation of collections responsibility to the appropriate staff, in order to fulfill all staff responsibilities defined in this policy.
 - 2.4. Advising each unit on its proposed Collections Plan for review and approval by the Director.
 - 2.5. Reviewing proposed collecting priorities to guide the development of each collection under the NMNH Collections Plan as it is developed, with reasonable resource needs projections, and submitting those to the Director for review and approval.
 - 2.6. Assuring compliance with *SD 600*, the *SD Implementation Manual*, and NMNH and collecting unit collections management policies.
 - 2.7. Assuring compliance with any directives related to collections specified in bylaws of the NMNH Advisory Board by the Board of Regents, through approval of reports for the Director's review.
 - 2.8. Recommending a representative Collections Committee with responsibility to advise the ADRC and Director of collections issues.
 - 2.9. Reviewing reports from the unit's chairs on the actions of Collections Advisory Committees in each collecting unit.
 - 2.10. Providing policy guidance, program direction and planning, and budget support to carry out the collections management requirements established in this policy.
 3. The **Chief of Collections** is responsible for the following, as well as for any functions that may be delegated by the ADRC and/or the Director:
 - 3.1. Assisting the ADRC and Director in the establishment, implementation, review, and revision of NMNH's collections management policy.
 - 3.2. Advising and assisting collecting units to develop, implement and revise museum and unit collections management policies.
 - 3.3. Maintaining copies of all collecting unit collection management policies.
 - 3.4. Advising collecting units, ADRC, and Director on issues of compliance with collecting unit, NMNH, and Smithsonian policy mandates.
 - 3.5. Advising collecting units, ADRC, and Director on legal, ethical and procedural requirements affecting NMNH and its collecting units.
 - 3.6. Working with each unit to develop the NMNH Collections Plan for review by the ADRC.
 - 3.7. Providing guidance on proposed collecting priorities under each unit's collecting plan and reasonable resource projections, and reviewing those priorities regularly.

- 3.8. Monitoring and documenting compliance with *SD 600*, the *SD 600 Implementation Manual*, and NMNH and collecting unit collections management policies, through preparation and approval of reports for the ADRC's and Director's review, including annual reports on collections use and transactions.
 - 3.9. Monitoring and documenting compliance with any directives related to collections specified in bylaws of the NMNH Advisory Board or by the Board of Regents.
 - 3.10. Maintaining and overseeing permanent documentation of all collections transactions.
 - 3.11. Establishing documentation requirements for NMNH collections activities.
 - 3.12. Advising the ADRC and Director on appropriate authorizations regarding collections management activities, and maintaining records on authorities on behalf of the museum.
 - 3.13. Working with the Assistant Director for Information Technology on information management systems and access to collections information.
4. The **Collections Officer** is responsible for the following, as well as for any functions that may be delegated by the Chief of Collections:
- 4.1. Advising the Chief of Collections on issues of compliance with collecting unit, NMNH, and Smithsonian policy mandates with regard to permits, permission and ownership issues.
 - 4.2. Managing the scientific permits process for NMNH, including application review, Director's signature and tracking, preparation of annual reports, staff training and updates, and responding to problem situations.
 - 4.3. Managing the receipt and tracking of cleared declarations from units, including cleared electronic declarations (eDecs).
 - 4.4. Working with each unit and the Chief of Collections to develop the NMNH Collections Plan for review by the ADRC.
 - 4.5. Documenting compliance with *SD 600*, the *SD Implementation Manual* and NMNH and collecting unit collections management policies through preparation and approval of reports for the Chief of Collections' review, including annual reports on collections use and transactions with the Office of the Registrar.
 - 4.6. Documenting compliance with any directives related to collections specified in bylaws of the NMNH Advisory Board or by the Board of Regents.
5. **The Office of the Registrar, which is a body led by the Chief of Collections, is responsible for the following:**
- 5.1 Serving as the record-keeper of collections transactions, and associated decisions and collections related activities.
 - 5.2 Implementing collections-related decisions made by the Chief of Collections regarding collections transactions.
 - 5.3 Assisting with the review of legal, policy, and ethical issues and exploration of options, supporting the departments in their collections work.
 - 5.4 Leading development and maintenance of automated transaction management systems.
 - 5.5 Managing specific aspects of transactions, including insurance, and coordinate with other offices as needed.

5.6 Leading cyclical inventories and maintaining the museum's records of its inventories.

6. The **Chairs/Heads of Collecting Units** are responsible for the following:

- 6.1. Directing the establishment, implementation, review and revisions of the unit collections management policy.
- 6.2. Delegating and overseeing implementation of the specific delegation of collections responsibility to the appropriate unit staff in order to fulfill all collections management policy requirements.
- 6.3. Appointing at least one Collections Advisory Committee for the unit, including representation by scientists and collections managers, and defining its role.
- 6.4. Reporting to the ADRC on the actions of the unit's Collections Advisory Committee(s).
- 6.5. Developing and approving the unit's collection's plan for review by the ADRC.
- 6.6. Assuring unit compliance with collecting unit, NMNH, and Smithsonian collections management policies, and reporting on compliance to the ADRC.
- 6.7. Selecting a representative to NMNH's Collections Committee which has responsibility to advise the ADRC and Director on collection issues.
- 6.8. Providing unit policy guidance, program direction and planning, and budget support to carry out the collections management responsibilities of the collecting unit in accordance with established policy.

7. The **Collections Managers** of collecting units are responsible for the following:

- 7.1. Contributing to the establishment, implementation, review and revisions of the unit collections management policy.
- 7.2. Assigning delegated collections responsibility from the Unit Chair to the appropriate unit staff.
- 7.3. Supervise collections management staff ensuring adherence to policy mandates and professional practices.
- 7.4. Serving on at least one Collections Advisory Committee for the unit.
- 7.5. Contributing to the unit's collections plan for review by the ADRC.
- 7.6. Contributing to development and implementation of the unit's collections plan for review by the Unit Chair.
- 7.7. Contributing to the development of proposed priorities to guide the unit's collections plan for approval by the Unit Chair.
- 7.8. Assuring unit collections management activities are conducted in compliance with collecting unit, NMNH, and Smithsonian policy requirements, and reporting compliance to Unit Chair.
- 7.9. Recommending to the Unit Chair a representative to NMNH's Collections Committee.
- 7.10. Requesting for unit policy guidance, program direction and planning, and budget support to carry out the collections management responsibilities established in this document.
- 7.11. Working with the Office of the Registrar to document collections transactions according to policy and OR requirements.
- 7.12. Providing direct physical care, preservation and access for collections.

8. **The Assistant Director for Information Technology**

- 8.1 Working with the Chief of Collections and Office of the Registrar staff, develop and maintain the museum's automated collections transaction system.
 - 8.2 Working with the Chief of Collections, the ADRC, and the Collecting Units, develop and maintain collections information systems that support collections control and accessibility, ensuring collections information security.
 - 8.3 Developing and maintaining the museum's Data Access Policy, and providing information per its terms as requested.
9. **Collections Advisory Committees** are unit-specific bodies, with representation by both scientists and collections managers in the unit, charged with advising the Chair on issues concerning proposed collections acquisitions, loans, borrows and deaccessions, as well as overall collections policy and procedure issues for the unit.
10. **The NMNH Collections Committee** is a museum-wide committee with representation from each collecting unit and NMNH facility, charged with advising the ADRC and Director on larger issues of collections policy.
11. **The Associate Director for Public Programs** is responsible for ensuring that collections made or acquired by Public Programs staff conform to this policy and that any such collections are cleared with the ADRC. In general, acquisitions of collections for educational or exhibit purposes may only be made under the authority of those units with delegated authority by the Director to acquire and accession, and must be consistent with that unit's collections plan.
12. **All staff, as well as affiliated agency staff officially stationed at NMNH, volunteers, fellows, and others with delegated collections management responsibilities or access to collections** are responsible for carrying out their delegated collections management responsibilities to ensure the following:
 - 12.1. Implementation of established collections management policies and procedures.
 - 12.2. Adherence to applicable professional practices.
 - 12.3. Proper management, preservation, and use of collections.
 - 12.4. The integrity and accuracy of collections information.
13. **Central Smithsonian offices**, such as the National Collections Program, Office of General Counsel, Office of the Inspector General, Office of Protection Services, Office of Safety and Environmental Management, and the Office of the Treasurer's Division of Risk Management, provide collections management service oversight to NMNH, as specified in *SD 600* and the *SD 600 Implementation Manual*.

F. Ethics

NMNH recognizes and accepts its fiduciary responsibility to provide proper management, preservation, and use of its collections and of associated information for the benefit of the international scientific community and the general public.

Staff have legal, ethical, and professional obligations to maintain high levels of honesty, integrity, and loyalty to the Institution and the museum. These standards of conduct are set forth in *Smithsonian Directive 103, Standards of Conduct. SD 103* establishes Smithsonian policy regarding ethical standards to which all Smithsonian employees are required to adhere.

All affiliated agencies that are stationed at NMNH are bound by the ethical standards established by their respective agencies. If such standards are in conflict with those of the Smithsonian, the affiliated agency employee must bring this to the attention of the Chair of that unit as well as to the ADRC.

Smithsonian employees are expected to be aware of and guided by generally accepted ethics and professional standards applicable in their fields, as published by reputable professional membership societies and organizations. If such standards are in conflict with those of the Smithsonian, the employee must abide by the Smithsonian's standards. Such a conflict should be brought to the attention of the Chief of Collections and the ADRC immediately.

1. NMNH staff, research associates, affiliates, interns, fellows and volunteers, and affiliated agency staff (all hereinafter referred to collectively as "staff"), shall not maintain personal collections in NMNH facilities without the express written approval of their Chair and ADRC. Such approval may be given only when it would be in the best interest of the Museum and for the sole convenience of the owner.
 - 1.1. Personal book collections used for work purposes, and personal collections determined to be reasonably outside the scope of the owner's unit and used primarily as office decoration, are excepted from this rule.
2. When approval is given for a personal collection to be kept on site an inventory of the collection shall be provided to the Chair and the collection shall be stored only in specific locations approved by the Chair.
3. Collections acquired or possessed contrary to legal requirements may not be brought into any NMNH facility.
4. Living animals that are not part of approved NMNH research projects may not be brought into any NMNH facility, except for service animals.
5. Staff shall comply with the standards regarding personal acquisition of museum items and commercial dealing in items, as stated in SD 103.
 - 5.1. No staff may acquire important collection items in direct competition with the collecting activities of any Smithsonian unit.
 - 5.2. In cases of conflict, or the appearance thereof, clearance must be obtained from a Smithsonian Ethics Counselor. In cases where the conflict cannot be resolved in other ways, clearance may require providing the Smithsonian the opportunity to purchase or otherwise acquire the object, or, if already acquired by the employee, a reasonable time for the Smithsonian to decide whether to obtain the object from the employee upon payment of the employee's costs of acquisition.
 - 5.3. Staff who are directly responsible for acquiring, managing or caring for items with NMNH collections must obtain clearance from the unit Chair, ADRC,

Director, and the Smithsonian Ethics Counselor for personal acquisition of any object, material or specimen that is within the scope of the collection for which they are responsible.

- 5.3.1.** Clearance is not required for objects received by staff as bequests, or for gifts that can be accepted pursuant to the requirements of SD 103.
- 5.4.** Staff who are directly responsible for acquiring, managing, or caring for NMNH collections who own a personal collection within the scope of the collection for which they are responsible must provide the unit Chair with a written list of items in that collection. The level of detail required and the timing of periodic updates of this list, should be set forth in the unit's collections management policy.
- 5.5.** No personal collecting may be done on NMNH business or field trips unless written permission from the Chair and ADRC is obtained in advance.
- 6.** Staff, research associates, affiliates, interns, fellows and volunteers, affiliated agency staff, NMNH Board members, and anyone whose association with NMNH might appear to provide advantage in acquiring collections items, shall not be permitted to obtain items deaccessioned from NMNH collections.
- 7.** Relatives or friends of staff may not engage in a collections transaction on behalf of the staff. Staff must encourage members of their immediate family to avoid direct competition with NMNH collecting activities.
- 8.** Staff shall not provide valuations or market appraisals of collections or collections items except for official museum purposes.
- 9.** All resources of the Smithsonian and NMNH, including collections, facilities, equipment and personnel, are to be used only for officially approved activities. Unauthorized use of these resources is prohibited and may subject the party to penalties under Smithsonian policies or applicable laws.

G. Accounting for Collections

Smithsonian collections are held for research, education, and public exhibition in furtherance of public service, rather than financial gain. Collections are protected, kept unencumbered, cared for, and preserved and they are subject to the requirement that proceeds from sales of collections are to be used to acquire other collection items.

Accordingly, the Smithsonian does not treat its collections as assets for purposes of reporting in its financial statements. The Smithsonian adheres to the applicable financial reporting standards governing collections held in public trust, as set forth in the *SD 600 Implementation Manual*.

H. Exceptions

Prudent exceptions to NMNH's CMP may be permitted in appropriate cases when in the best interests of the Smithsonian and NMNH. Exceptions must be approved according to the process stated below.

All exceptions must be approved by the:

- National Collections Coordinator,
- General Counsel,
- Under Secretary for Science and
- Deputy Secretary and Chief Operating Officer

Requests should be submitted by the Director to the National Collections Coordinator, who will facilitate the required review.

The National Collections Coordinator will annually report to the Secretary all exceptions that have been authorized during the reporting period.

I. Compliance

The **Director** is responsible for the museum's compliance with *SD 600*. As required by this directive, the Director must submit to the Secretary an annual report on NMNH's compliance with NMNH Collections Management Policy, *SD 600* and the *Implementation Manual*.

NMNH's **Office of the Registrar** plays a critical role in documenting compliance by permanently maintaining official signed documents (including documentation of collections ownership, collections custody, legal permits and letters of permission) and maintaining associated electronic databases.

A formal reporting protocol is invaluable in documenting museum compliance at all staff levels, as well as for collections not monitored by the above offices. This protocol shall include the following elements:

1. All employees who work with collections in the course of their assigned duties will have an element in their performance plan that affirms compliance with NMNH and Smithsonian CMPs and any unit policies and procedures. This includes staff with direct responsibility to collect, acquire, lend, borrow, sample, or analyze items, as well as those with authority to approve such activities, and supervisors of collecting unit staff.
2. Each collecting unit will develop a compliance checklist as part of its CMP implementation document. Unit checklists will be based on a template provided by the NMNH Collections Committee, and reviewed by that committee for consistency across units. Collections managers and other supervisors in the unit will be required to check off areas in which the unit has complied, and to account for areas of noncompliance. The unit Chair will then provide a signed compliance statement with checklist to the Collections Committee.

The **Collections Committee** will review all NMNH collecting unit statements/checklists, summarize the information for the entire museum, and submit it through the ADRC to the Director or designee. The Director will annually report on NMNH compliance to the Secretary and the NMNH community.

J. NMNH Policy Requirements

Guiding Principles

1. Only designated collecting units have the authority to acquire and manage collections. The Director, with input from the museum's Collections Committee, will determine the level of collecting authority to be delegated to the collecting unit. In determining the level of delegation, the Director will examine the facts associated with a unit's need to acquire, accession, deaccession, dispose, maintain, and use collections. The Director will designate authorized collecting units in writing via formal letter. This authority must be renewed in a regular basis that is consistent with the needs of the NMNH. Unless explicitly authorized on a case-by-case basis, and in writing, no other units have the authority to acquire and manage collections.
2. Each collecting unit develops, implements, and adheres to a written collections management policy approved by the Director to ensure the proper physical care and preservation of its collections; provide for the documentation of the identification, location, condition, and provenance; and ensure accessibility consistent with their preservation, security, and legal considerations. Collecting unit policies adhere to the policies set forth in this document, *SD 600*, and the standards established in the *SD 600 Implementation Manual*. In the event of any conflict between NMNH and collecting unit policies, the NMNH policy shall have precedence unless specifically approved by the Director in writing.
3. Each collecting unit has a Collections Advisory Committee authorized by the Director to guide the unit's acquisition, disposal, loan, use, and access proposals, decisions and actions regarding the unit's collections.
4. All policy-related decisions and collections transactions are documented by written records.
5. Collecting unit policies are periodically reviewed and, if necessary, revised and reauthorized.
6. Each collecting unit develops policies specific to the nature, scope and character of their collections and discipline. Collecting unit policies must include the following components and provisions:
 - 6.1 Statement of purpose
 - 6.2 Primary statement of authority
 - 6.3 Definition of collection
 - 6.4 Collecting scope statement
 - 6.5 Specific collections management activities
7. Each collecting unit must develop a collections plan.

Categories of NMNH Collections

This policy applies to all of NMNH's collections, which fall within the following categories:

Permanent Accessioned Collection: Items deemed to be of major significance for research or exhibition, or considered important to preserve as part of the world's natural history or cultural heritage. Items accessioned into the permanent collection are expected to be preserved as part of the permanent collection for an indefinite period of time. The permanent collection includes ancillary collections, which are of two types:

- Those items that are not themselves collection materials, but that support a collection item as documentation.
- Collections of images, recordings, scientific reproductions or archival materials that are representations of items or phenomena.

Teaching Collection: Items not desired for permanent accessioned collections, but appropriate for educational purposes or other uses. Each unit holds teaching collections, and in addition there are teaching collections in the Naturalist's Center, Insect Zoo, and Discovery Room.

Unaccessioned Collection: Items not suitable for inclusion in the permanent accessioned collection because of an agreement, impediment, duplication, or other some other consideration which leaves them available for exchange, sampling and destruction, or means that they must be maintained per agreement. This category can also include items that are part of the processing backlog of materials that may eventually become part of the permanent collection.

II. NMNH Policy Elements

A. Acquisition and Accessioning

Acquisition is the act of gaining legal title to a collection item or group of items.

Accessioning is the formal process used to acquire legally and record a collection item or group of items into NMNH collections.

Principles

The acquisition of collections is fundamental and critical to the mission and purpose of the NMNH. The NMNH acquires collection items by a variety of methods, including gift, bequest, purchase, exchange, transfer, and field collecting. In addition, some NMNH collecting units may also acquire collections by propagation. Some items may be acquired as exhibit props or specifically for teaching collections.

NMNH requires responsible, disciplined acquisition of collections through the following principles:

- Acquisition of collections relevant to the mission and goals of the NMNH.
- Establishment and periodic review of collections plans that define collecting goals and priorities.

- Clear delegation of collecting authority within NMNH.
- Use of formalized acquisition evaluation criteria.
- Strict adherence to professional ethics and all applicable laws and regulations relating to collections acquisition.
- Consideration and approval of the associated life-cycle costs of collections management and preservation.

Policy

1. All collections acquisitions are subject to this policy. Collections may be acquired only in accordance with established authority and only when consistent with applicable law and professional ethics. NMNH exercises due diligence in complying with all applicable federal, state, local, and international laws, treaties, regulations, and conventions. Laws and regulations will be observed, and compliance documented.
 - 1.1. The primary collecting authority rests with the Director, who delegates responsibility to appropriate staff and committees. The type and value of the collection item under consideration may dictate the level of delegated authority.
 - 1.2. Each NMNH collecting unit must stipulate the appropriate staff to whom collecting authority has been delegated, and establish policy and procedures for the formal review and approval of collection acquisitions.
 - 1.3. Any delegation of collecting authority to non-Smithsonian employees must follow guidelines in the *SD 600 Implementation Manual*. Delegation must be made in writing by the collection unit chair or head in advance of the collecting activity.
2. NMNH observes the highest legal and ethical standards in the acquisition of collections. Collecting units shall exercise due diligence in the acquisition of collections, including making reasonable inquiries into the provenance of collection items under consideration for acquisition. Inquiries are made in order to determine that the NMNH can acquire valid title to the collection item and that the acquisition will conform to all legal and ethical standards, as set forth in the *SD 600 Implementation Manual* and in Section 11 of the NMNH Collections Management Policy.
 - 2.1. The Director, before authorizing an acquisition directly or through designee(s), has the responsibility to ascertain that the collection in question was not stolen or wrongfully converted, and is not illegally present in the United States.
 - 2.2. The Director has the responsibility to ascertain directly or through designee(s) that any proposed new acquisition was not unethically acquired from its source, unscientifically excavated, or illegally removed from its country of origin.
 - 2.3. Staff will use due diligence in reviewing the legal and ethical status of acquisitions by consulting with the Office of the Registrar, the National Collections Program, and the Office of General Counsel as necessary.
3. NMNH will not acquire, by direct or indirect means, biological, ethnographic, archaeological, or geological items that have been collected in contradiction of laws governing such collecting.
 - 3.1. NMNH supports the effort to halt the continuing degradation of the world's natural history, archaeological, ethnographic, historic, and artistic resources. NMNH's collecting activities are in compliance with national and international law and treaty obligations, and with the spirit and intent of efforts to protect and enhance cultural and natural heritage.

4. Potential acquisitions must undergo a rigorous, documented selection and review process.
 - 4.1. NMNH collecting units must establish evaluation criteria for reviewing potential acquisitions. These criteria must be stated in the unit's policies.
 - 4.2. Evaluation criteria must be actively used by Collection Advisory Committees and authorized collecting staff during the review of all proposed acquisitions.
 - 4.3. Collection records must document decision-making processes of acquisitions evaluation including proposal, review, and approval.
5. NMNH may be offered collections from institutions that can no longer care for items. When such material meets appropriate collecting unit criteria for acquisition, it may be considered for acceptance.
 - 5.1. If there are institutions where the collections would be more appropriately housed, or where there are researchers who would actively study them, the NMNH will work with its colleagues to facilitate the placement of such collections in those locations instead of acquiring them.
6. NMNH may acquire items jointly with other institutions or museums with which it agrees to share ownership and management. In such events, a written agreement must stipulate the terms and conditions of the agreement and the responsibilities of each party. This must be formalized and approved before final acceptance. The Office of the Registrar and Office of General Counsel should be consulted in such cases.
7. As a general rule, items are acquired and accessioned only when there is a good faith intention to retain them in the collections for an indefinite period of time. Under certain circumstances, collections may be acquired that may be subject to consumption in part or whole, or which may be culled in the course of identification and study. If at the time of acquisition NMNH intends to dispose of part or all of the collection, this decision must be documented in museum records and communicated to the source or party conveying ownership.
8. NMNH only acquires unrestricted collections as a general rule. Certain restrictions are routinely accepted, such as instances in which the country or agency of origin places restrictions on use and disposal, or on retention of intellectual property rights. Any restrictions must be documented in museum records at the time of acquisition, and must be reviewed by the collecting unit chair or head, Office of the Registrar, Associate Director for Research and Collections, and Director, as is appropriate in each case.
 - 8.1. Exceptions to this rule may be approved in accordance with guidelines established in the *SD 600 Implementation Manual*.
9. Where applicable, ownership of copyright and other intellectual property rights must be established at the time the collection is considered for acquisition. NMNH may obtain ownership or control of copyright through methods outlined in the *SD 600 Implementation Manual*.
 - 9.1. In considering works of visual art, the moral rights of living artists (the right of attribution and the right of integrity) will be taken into consideration at the time a

work is proposed for acquisition, as delineated in the Visual Artists Rights Act of 1990.

- 10.** Authority to document and process acquisitions and accessioning is vested in the Director and delegated to the NMNH Office of the Registrar.
 - 10.1.** The Office of the Registrar establishes what documentation is required.
 - 10.2.** Collecting units are responsible for providing documentation to the Office of the Registrar.
- 11.** Consultation with the Director is required before acquisition of any collection that would require substantial resources beyond the collecting unit's or Museum's allocated budget, or substantial resources of other units for the management or preservation of the collection.
 - 11.1.** The Director must refer any proposed acquisition that in his/her judgment needs additional review because of unusual circumstances to the Under Secretary for Science.
- 12.** Among the various Smithsonian or NMNH collecting units, some overlap in collecting is inevitable; however, competition for a particular acquisition is inappropriate. When more than one collecting unit seeks to acquire the same collection item, the parties concerned must agree on which unit will acquire the collection item.
 - 12.1.** If the competition for an acquisition is at the Smithsonian level, the parties will be guided by *SD 600* in gaining resolution.
 - 12.2.** If the competition for an acquisition is within NMNH and the parties involved cannot resolve the placement of a collection item, the Director will make a final decision.
- 13.** NMNH will avoid competitive bidding with federal organizations for collection items of common interest, and will seek mutually acceptable agreements whenever the potential for competitive bidding with such organizations becomes apparent.
- 14.** NMNH collecting units may accession a specimen(s) "found in collection" if there is no evidence that the item(s) entered the museum as a loan, and if continued undisturbed possession supports the presumption of a valid acquisition of ownership.
- 15.** NMNH does not accession every collection item it acquires, depending upon the intended uses of the item.
- 16.** NMNH scientific collecting units have the right of first refusal for items offered to or acquired for interpretive purposes by the Office of Public Programs. The collecting units will make every effort to make these items available to the Office of Public Programs. The Director will make a final decision in the event of a dispute.
- 17.** Collecting units shall not opportunistically or purposefully collect or acquire items outside of their recognized discipline on behalf of another collecting unit without the prior agreement of the Collections Advisory Committee of the relevant collecting unit.
- 18.** When a proposed acquisition is inappropriate for an NMNH collecting unit, staff should recommend another NMNH unit or Smithsonian unit if the collection item is consistent with the collecting goals and mission of that unit.

- 18.1. When the NMNH cannot accommodate a collection, staff may assist potential donors in locating local, regional, or international repositories that can effectively use the collection for educational or scientific purposes.
 - 18.2. NMNH may decline offers of collections items at its discretion in accordance with established policy, authority and acquisition criteria.
19. Acquisitions, once accessioned, are subject to the deaccessioning criteria of this policy and the *SD 600 Implementation Manual*.
- 19.1. Certain laws may require that acquired and accessioned objects be deaccessioned from the collections of the NMNH and repatriated elsewhere as per the specific statute or law. Prospective donors of material likely be affected by such laws are to be informed of this issue during initial donation discussions.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the Museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to recommend, approve, document, and process acquisitions and accessioning.
3. Clearly define and stipulate the roles and responsibilities of all collecting unit Collections Advisory Committees regarding the evaluation of potential acquisitions.
4. Develop and implement an approved collections plan in accordance with the NMNH Collections Plan.
5. Establish evaluation criteria for reviewing new acquisitions, such as:
 - 5.1. **Collection Priorities:** The collection items are consistent with the collecting unit's collections plan and goals of NMNH. The acquisition has potential use for research, exhibition, education, or other forms of public outreach.
 - 5.2. **Uniqueness:** The collection items are so unique or unusual that they warrant special consideration.
 - 5.3. **Legality:** The collection items meet provenance and legal standards. The collection items can be acquired with valid title or the right to convey the same. Compliance with applicable laws and regulations is observed and documented.
 - 5.4. **Ethical considerations:** The item or collection was obtained ethically, and compliance was documented.
 - 5.5. **Documentation:** There is adequate scientific documentation accompanying the item or collection.
 - 5.6. **Resource impact:** There is adequate space to properly house and adequate staff time to properly process the items being considered. Storage, maintenance and/or conservation can be appropriately met given current and reasonable expectations of future museum resources.
 - 5.7. **Cost:** Funding for acquisition (transportation or purchase) has been approved in advance of the transaction.

6. Establish guidelines for resolving disputes regarding potential acquisitions under review within the collecting unit.
7. Establish appropriate methods of acquisition.
8. Ensure documentation of legal title and provenance of collections acquired.
9. Establish standard procedures for considering and approving restrictions.
10. Establish guidelines for the approval of purchases using Institutional or external funds. The Director must approve these guidelines.
11. With the Office of Public Programs, establish guidelines for the documentation and management of unaccessioned educational and teaching collections.
12. Establish guidelines and procedures for approving and maintaining personal collections maintained at NMNH.
13. Make a good-faith effort to determine that the item(s) is not an unclaimed loan and was not previously accessioned by reviewing accession, inventory and loan records.

The **Office of the Registrar** must:

1. Establish documentation requirements for acquisition transactions.
2. Ensure documentation of legal title and provenance of collection items acquired, consistency of documentation, and proper maintenance and preservation of original records.

The **Director** and **collecting unit chairs or heads** must:

1. Assume responsibility for insuring that the Institution's procedures are followed when purchasing a collection with Institutional or external funds.

B. Deaccessioning and Disposal

Deaccessioning is the process used to formally approve and record the removal of a collection item or group of items from the NMNH's accessioned collections.

Disposal is the act of physically removing a collection item or group of items from an NMNH collection.

Repatriation is the act of removing collections items in accordance with provisions of the National Museum of the American Indian (NMAI) Act [20 USC. § 80q (1989)] or other applicable laws or policies, in order to be returned to either lineal descendants of the original individuals or owners, or to representatives of the culture of origin as defined by law.

Sampling and destructive analysis refers to any of a number of procedures in which items, or samples of those, are removed for research, entailing the use of analytical processes that require the destruction of part or all of an item in order to obtain information.

Principles

As a general rule, items are acquired for NMNH collections only when there is a good-faith intention to retain them for an indefinite time period. They are retained as long as they continue to serve the goals and objectives of the NMNH and can be properly maintained and used.

Deaccessioning and disposal are a legitimate part of responsible collections management. Prudent collections management actions, including judicious evaluation, deaccessioning, and disposal of existing collections, are intended to refine and improve the quality and relevance of the collections with respect to the museum's mission and purpose. Associated procedures are designed to insure thoughtful, well-documented consideration of each proposed collection item in the context of the long-term interest of the Smithsonian, the general public, and the collection item.

Deaccessioning and disposal occur for a variety of reasons, such as deterioration of collection items beyond usefulness; duplication or redundancy of collection material; insufficient relationship of collection items to the mission and goals of the museum such that they are judged to be better placed elsewhere; repatriation; and selection for consumptive research or educational use.

The NMNH Repatriation Office, in accordance with the NMAI Act, sets repatriation policy and procedures. These supersede policy and procedures for all other forms of deaccessioning and disposal for affected collections; reviews and approvals are specified with the guidelines of the Repatriation Office which is the authority for repatriation of NMNH collection items.

Sampling and destructive analysis procedures are set at the collecting unit level for all routine consumptive uses of collections items. Extraordinary sampling or destructive analysis, as defined below, requires additional approval above the collecting unit level.

NMNH disposes of collections by a variety of methods, such as donation, transfer, exchange, sale, repatriation, and destruction.

Policy

1. Collections may be deaccessioned and disposed of only in accordance with established authority and only when consistent with applicable law and professional ethics.

- 1.1** All applicable federal, state, local, and international laws, treaties, and regulations and any other applicable restrictions will be observed and documented.
- 1.2** Staff will use due diligence in reviewing legal and ethical of the item and proposed action.
- 1.3** Staff will obtain the necessary appraisals and approvals based upon values outlined in *SD 600*.

2. Collection items shall only be deaccessioned in compliance with the criteria and procedures established by the unit's Collections Advisory Committee.
3. Collections may be sold only when proceeds realized from public sale are designated for additional collection acquisitions within the collecting unit that disposed of the items. The Director must approve all sales in advance.
4. The collecting unit disposing of collections items shall comply with all legal and regulatory requirements that may be posed by hazardous or regulated materials. Compliance with those requirements will be documented.
5. Deaccessions and disposals, including destructive analysis or sampling may proceed only after establishing clear and unrestricted title to an item. In cases where title is in question, the collecting unit must first seek guidance from the Office of the Registrar, the National Collections Program and the Office of General Counsel.
6. All exchange of items must be made per written exchange agreements.
7. Written records of deaccession transactions must be promptly forwarded to the Office of the Registrar.
8. Collection items may not be disposed of without undergoing the deaccession process unless they meet the following criteria:
 - 8.1 They are unaccessioned or have no evidence of ever having been accessioned, and have no associated number; and
 - 8.2 They lack any and all data needed to associate them with a donor or other records.
9. Disposal by the following methods requires the Director's approval:
 - 9.1 Sale
 - 9.2 Extraordinary destruction for disposal or destructive analysis as defined below
10. Only the following disposal methods may be used without the approval of the Director:
 - 10.1 Documented exchange;
 - 10.2 Long-term open exchange with recognized educational organizations involved in similar research;
 - 10.3 Return to the rightful owner when NMNH lacks title;
 - 10.4 Donation to an educational organization;
 - 10.5 Transfer to another Smithsonian or Federal organization;
 - 10.6 Transfer to another organization under the terms of an established collecting agreement or contract;
 - 10.7 Routine destruction for disposal or destructive analysis as established by the standards of the collecting unit.
 - 10.8 Routine destruction of items from teaching collections that have deteriorated past usefulness.
 - 10.9 Repatriations as approved by the Secretary.

11. Collection items deaccessioned by any means other than repatriation may not be acquired through any means by NMNH Board members, staff or associates, affiliated agencies staff, volunteers, interns or fellows.
 - 11.1 Repatriated human remains and objects may on occasion be legitimately transferred to a Smithsonian employee, volunteer or other associate, but only in those instances in which
 - 11.1.1. The Smithsonian party is also a legitimately appointed representative of the affected tribal group or nation, **or**
 - 11.1.2. The Smithsonian party is a lineal descendant of a named individual whose remains or items are repatriated under the NMAI Act, **or**
 - 11.1.3. The Smithsonian party is a lineal descendant of a named individual whose remains are held in the NMNH, and the Smithsonian party requests the returns of those remains only, **and**
 - 11.1.4. The Smithsonian party has not participated in an official capacity in this determination.
 - 11.2 Transfer of repatriated human remains or objects to NMNH Board members, staff or associates, affiliated agencies staff, volunteers, interns or fellows must be approved by the Office of General Counsel.
12. Destructions requiring a high level of approval must be witnessed by the Director or designee. The Director's approval is required before the destruction, including destructive analysis, of any item(s) meeting one or more of the following criteria:
 - 12.1 Item is classified as a holotype specimen and sampling technique would destroy a significant portion of it, or a Smithsonian iconic object.
 - 12.2 Item has been independently appraised as having a value of over \$10,000 **and** is being considered for outright destruction rather than analytical sampling.
 - 12.3 Item is considered to have a very high public profile in the United States and/or in its country of origin.
13. Routine destruction for disposal or destructive analytical studies of items does not require approval outside the collecting unit.
14. When collections items proposed for disposal are suitable for public teaching purposes, such items should first be offered to the Office of Public Programs.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility for approving, documenting, and processing the deaccession and disposal of accessioned NMNH material.
3. Incorporate applicable guidelines for deaccessions and disposals from *SD 600*, the *SD 600 Implementation Manual*, and this policy into the unit's procedures.
4. Establish evaluation criteria for deaccessions and disposals.
5. Establish appropriate methods of disposal.
6. Establish criteria for approving, documenting, and processing the disposal of nonaccessioned items.

7. Establish criteria for determining routine and acceptable sampling and analytical uses of collections items that may involve partial or complete destruction of an item.
8. Establish protocols for managing the data resulting from destructive analysis.

The **Chairs**, the **Chief of Collections** (for the Office of the Registrar), and the **ADRC** must:

1. Review disposals and deaccessions meeting *SD 600* and unit criteria for higher level authorization
2. Coordinate the preparation of review materials for actions requiring higher level review.
3. Coordinate with the Office of the Registrar to document the completion of disposals that required review or witnessing beyond the collecting unit

C. PRESERVATION

Preservation is the protection and stabilization of collections, as well as their associated information, through a coordinated set of activities aimed at minimizing chemical, physical, and biological deterioration and damage and preventing loss of intellectual, aesthetic, and monetary value. Preservation is an ongoing process with the goal of making collections available for current and future use.

Principles

The NMNH's ability to carry out its mission is directly related to its commitment and ability to provide for the physical care and adequate storage of collections as well as preserving the information inherent in them.

Policy

1. The NMNH adheres to principles and policies set forth in *SD 600*.
2. Conservation intervention, restoration, destructive sampling, or consumptive use of collection items shall be carried out only as authorized by the appropriate collecting unit advisory committee or established policy.
 - 2.1 The collecting unit shall appropriately document these activities.
3. The collecting unit shall assess and record the condition of collection items selected for loan to others, whether internal or external, through the loan agreement at the time the loan is established.
4. Each collecting unit shall assess the status of the collections within its oversight on a cyclical basis. This cycle shall be established by the collecting unit's policy except when established by the Director. This information will be reported to the Director or designee.
5. NMNH must balance current research and educational use with the preservation requirements of collection items to ensure that collection items are maintained for future generations and rightfully serve their intended purpose.

6. No collecting unit shall obtain collections that require facilities or substantial resources beyond the unit's allocated budget or substantial resources of other Smithsonian units for the management and preservation of the collections without first gaining the approval of the Director.
 - 6.1 The Director is responsible for ensuring that the NMNH and MSC facilities provide the basic utilities and programs for safety and well being of the collections.
 - 6.2 During periods of renovation or construction, it is the responsibility of the Director or designee to coordinate collections security and care efforts with the collecting units and other Smithsonian offices in a clear and timely manner.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the Museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility for the preservation of collections in the unit's policy.
3. Incorporate applicable guidelines for preservation set forth in the *SD 600 Implementation Manual*.
4. Establish and implement preservation policies, standards and procedures in accordance with the mission of the collecting unit and the nature, purpose, and use of the collection, in order to provide preservation, protection, and security for all collections acquired, borrowed, and in the custody of the collecting unit, including associated information.
5. Ensure that collections and their associated information are cared for and maintained in conditions that preserve and extend their physical and intellectual integrity for use in research, exhibition and education.
6. Balance current research and educational use with the preservation requirements of collection items to ensure that collection items are maintained for future generations and rightfully serve their intended purpose.
7. Establish an integrated pest management plan that promotes the preservation of its collections as well as those of other NMNH collecting units. The plan must be approved by the Director or designee.

The **Associate Director for Research and Collections** must:

1. Approve preservation and integrated pest management plans for NMNH facilities, assign centralized responsibility for development of facility plans, and ensure that collecting unit plans complement the overall NMNH plans.

D. Collections Information

Collections information is the documentation of the intellectual significance, physical characteristics, location and legal status of collection items, as well as the collections management processes they undergo and their use in education and

exhibitions. Collections information is part of an ongoing process, with documentation residing in many formats, including documentary files (e.g. field notes and logbooks, illustrations, and photographs), electronic information systems, and multi-media formats. The value of collections information lies in its quality, integrity, comprehensiveness, and potential for use for research and educational purposes.

Principles

The documentary value of a museum collection is a principal criterion for its excellence. Well-documented results of scientific, historic, and aesthetic research enable the NMNH to fulfill its mandate to increase and diffuse knowledge.

The primary purpose of collections information is to provide access to NMNH collections, research findings, and the stories they can tell. To support this goal, the NMNH has a responsibility to acquire, develop, and maintain collections information systems that enhance access to and accountability for its collections and research findings and to ensure long-term preservation of the resultant information in manual and electronic formats.

To that end, the NMNH is committed to the fundamental objective of effective use of its collections by placing collections information and images in computerized databases, maximizing the application of networked technologies, implementing professional documentation standards, and sharing collections information through collaborations among NMNH collecting units and with other educational and research institutions.

Policy

1. Centrally supported collections information systems that document collection holdings and transaction management must support and meet NMNH goals for accountability and access.
2. Access to electronically maintained data, and to holographic paper and documentary files, is governed by the standards established in the NMNH Data Access Policy.
 - 2.1. Use of data for non-commercial purposes or by not-for-profit entities and organizations must conform to conditions/stipulations enumerated in *Collections Information Access and Data Sharing at the NMNH*.
 - 2.2. Use of data for commercial purposes, by for-profit entities and organizations, or by individuals, requires approval by the Director or designee, after consultation with the Office of General Counsel. Acceptable usage and profit-sharing arrangements between the user and NMNH must be stipulated in a formal agreement approved by the Director or designee, Office of General Counsel, and Office of Contracting (where appropriate).
3. The provenance of acquired collection items is a matter of public record. Access to certain sensitive information, such as donor and collector information, custody and physical location, collecting localities, intellectual property restrictions, security, and requirements for restricted use, and other issues of privacy, may legitimately be limited at the discretion of the collecting unit. Decisions about limitations must be documented by the collecting unit's Collections Advisory Committee. The collecting

unit shall consult the Office of General Counsel and the Office of the Registrar when determining policy for restriction of access to information.

4. Collections information, including all records of collections-related decisions and activities, must comply with established NMNH and Smithsonian standards, and must be maintained according to accepted practice.
5. Ownership and custody information for all collections items must be recorded by the collecting unit, in a method and format appropriate to the collection status of the item.
6. All original primary collection records (e.g. field notes, research-related notes, images, photographs, illustrations, correspondence, original card catalogues, sound and visual recordings, and other records and documents directly or indirectly related to the collections or collection activities of NMNH) are the property of NMNH.
 - 6.1. All such original primary collection records are to be maintained in good order and must be accessible to staff, in keeping with current archival policy and standards.
7. The NMNH is responsible for collections data development, maintenance, preservation, and retention. All media containing collections information are maintained for long-term use and must be preserved in keeping with archiving policy and standards.
8. The responsibilities for information protection and retention is as follows:
 - 8.1. The Office of the Registrar is responsible for retaining, archiving and protecting all original collections records. NMNH collections records are the property of the Smithsonian.
 - 8.2. Original documents relating to all collections transactions, including acquisition, accession, loan, borrow, exchange, deaccession, shipping, insurance and disposal, as well as all associated information, are managed and preserved by the Office of the Registrar.
 - 8.3. The Assistant Director for Information Technology, in collaboration with collecting units, develops and implements procedures, and allocates resources for the protection and management of collections information in electronic form.
9. Disputes involving access to, or use of, collections information will be resolved by the Director or designee. The Office of General Counsel must be consulted regarding all Freedom of Information Act requests.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility for developing, managing, and preserving collections information.
3. Establish authority and assign responsibility for developing and managing collections information systems upon receipt of necessary resources.

4. Incorporate applicable guidelines for collections information set forth in the *SD 600 Implementation Manual*.
5. Establish a collections information policy to meet NMNH objectives, and assign responsibility to collecting units to provide methods demonstrating compliance with museum policy.
6. Establish documentation standards to ensure the quality, integrity, comprehensiveness, proper maintenance, management, and dissemination of collections information.
7. Maintain collections information on the historical, scientific, or aesthetic significance; legal status; provenance; and the use and management of its collections and collections in its custody.
8. Promote the widest dissemination of collections information consistent with its stewardship responsibilities and consistent with the Data Access policy.

The **Assistant Director for Information Technology** must:

1. Collaborate with the Chief of Collections, the collecting units, and the ADRC as appropriate to develop and maintain collections information management systems.
2. Apply relevant collections information management policies and procedures, revising them as appropriate with the ADRC's and Director's approval.
3. Maintain systems to ensure the preservation and accessibility of collections information, including disaster recovery and security procedures.

The **Director** must:

1. Develop, implement, and maintain automated collections information systems to facilitate collections management and make collections information accessible to the general public, scholars, and staff for non-commercial educational and research purposes.
2. Maintain backup copies of mission-critical electronic files and paper records off-site.
3. Maintain records and other information related to the exhibition of NMNH items in any venue.

E. Inventory

Inventory is an information base containing sufficient information to allow retrieval of collection items, groups, or lots; the process of physically locating all or a selection of items for which the museum is responsible; and appropriate information to facilitate research, collections management, security, and access.

Cyclical Inventory is a planned inventory of collection items conducted according to a predetermined schedule. Cyclical inventories may include a complete inventory or a specific percentage or sampling of the entire collection inventory, as predetermined using statistically sound inventory methods.

Principles

Effective collection management requires a system to support decisions regarding collections use, growth, storage, and security. In addition to facilitating research, documentation, and storage, an ongoing inventory program is an essential security device to deter and detect theft of collection items. Inventory records serve as a tool for

accountability, and are also useful in supporting other NMNH programs when augmented with additional documented information.

Policy

All **collecting units** must:

1. Keep accurate records of collections item location information
 - 1.1. All collection items entering or leaving a unit must pass through a control point designated by that unit.
 - 1.2. Records of movement of all collections items will be maintained in the Office of the Registrar.
2. Have a cyclical inventory plan that has been approved by the Director or designee.
 - 2.1. The Associate Director for Research and Collections is responsible for ensuring the coordination of collections inventory plans and the implementation thereof.
3. Ensure adequate separation of duties and other internal controls to minimize the possible unauthorized removal of collection items and corresponding records.
4. Maintain and update an inventory of all items on exhibit or in exhibit storage.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility for conducting, supervising, and approving cyclical inventories and reconciliation of collection records.
3. Incorporate applicable guidelines for inventory set forth in the *SD 600 Implementation Manual*
4. Establish and implement an inventory process and a written cyclical inventory plan appropriate to the character and size of the collection in its care in accordance with the *SD 600*.

The **Office of the Registrar** must:

1. Coordinate and lead the development of museum-level inventories and plans, reviewing them and making recommend for the Director's approval.
2. Maintain records of inventories and audits.
3. Working with the Office of Public Programs, maintain inventories of items loaned to the museum for temporary exhibit.

F. Risk Management and Security

Risk management is the process of identification and evaluation of risk in order to prevent or minimize exposure to factors that may cause loss, damage, or deterioration of collections.

Principles

The programmatic activities of the NMNH naturally involve an exposure of collections to risks of damage or loss. Exposure to risks can occur to a collection item when it is on exhibition or loan, in transit, in storage, or while being studied, treated, or handled. Potential hazards include natural disasters, vandalism, terrorism, theft, disease, space and environmental deficiencies, human error, mechanical or operational system failure, and deterioration.

Prudent collections management requires identification, reduction, or elimination of risks to the collections through a systematic risk management assessment program. Risk management requires thoughtful review of potential hazards.

Policy

1. The NMNH will endeavor to minimize and control the level of risk of loss or damage to collections through established collections management practices.
2. Effective management controls are the responsibility of all NMNH managers and supervisors responsible for collections, who assure sufficient control and accountability in accordance with SD 115, *Management Controls*.
3. Staff has the obligation to be aware of the Institution's risk management and security process. Staff must note and communicate to the appropriate office, in accordance with the guidelines set forth in the *SD 600 Implementation Manual*, situations that create the potential for damage or loss to collections, personal injury, or legal liability.
4. Risk management and insurance is coordinated at the Smithsonian by the Office of the Treasurer's Risk Management Division and governed by SD 108, *Insurance and Risk Management*. At NMNH risk management and insurance is coordinated with the Treasurer's Risk Management Division through the ADRC.
5. Security is coordinated at the NMNH by the Office of Protection Services through the Associate Director for Operations.
6. Except in extraordinary circumstances, the NMNH does not insure its own collections while they are in the care and possession of the NMNH. Collections on loan to the NMNH and NMNH collections on loan to or in the custody of others will be insured as stipulated by authorized loan agreement or negotiated contract.
7. Insurance proceeds from the settlement of claims for damage to NMNH collections will be used for the conservation and restoration of the specific collection item.
 - 7.1. If received on account of a total loss of a collection item or in excess of the cost of conservation and restoration of a damaged collection item insurance proceeds will be designated only for collections acquisition in the collection unit that sustained the loss.

8. The Director shall develop and maintain a disaster preparedness and response plan that includes planning, response, and recovery from disasters as well as evaluation and assessment following an incident. All NMNH facilities, owned or leased, must have a written comprehensive disaster preparedness plan as required by SD 109, *Disaster Preparedness*.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Provide storage environment appropriate to protect the collection from deterioration upon receipt of necessary resources and in conjunction with appropriate facilities conditions for collections areas.
3. Participate in risk management activities such as the development and implementation of disaster management plans, and implementation of safety protocols.
4. Periodically review all aspects of collections management activities to reduce risks.
5. Communicate immediately to the Office of the Registrar regarding suspected or known collections losses or damage.

The **Office of the Registrar** must:

1. Maintain records of collections risks, known problems, and associated actions.
2. Coordinate with the Office of the Treasurer's Risk Management Division to obtain insurance and monitor the museum's use of insurance.

The **Associate Director for Research and Collections** must:

1. Establish authority and assign responsibility for risk management.
2. Incorporate applicable guidelines for risk management set forth in the *SD 600 Implementation Manual*.
3. Ensure that collections are maintained in controlled areas that are adequately protected against fire, theft, terrorism, vandalism, deterioration, and natural disasters.
4. Establish procedures for immediately reporting and documenting damage, loss, or possible theft of collections in its custody and on loan.

The **Associate Director for Operations** must:

1. Establish authority and assign responsibility for security activities.
2. Incorporate applicable guidelines for security set forth in the *SD 600 Implementation Manual*.
3. Ensure that collections are maintained in controlled areas that are adequately protected against fire, theft, terrorism, vandalism, deterioration, and natural disasters.
4. Establish authority and assign responsibility for the development, implementation and coordination of the unit's disaster plan and program.
5. Establish and implement a written comprehensive disaster preparedness plan for NMNH facilities through a committee with representation from collections, research, public programs, operations (financial, personnel), OFEO, OPS, Affiliated Agencies

and other resident groups organizations, business & development activities and public affairs.

6. Establish a security plan that protects the collections during both normal and high-risk activities.

G. Access

Access is the opportunity for the general public, scholars, and Smithsonian staff to utilize the diverse collection resources of the museum.

Principles

To carry out its mission, NMNH promotes access to its collections and associated information through research opportunities, reference systems, loan and exchange of collections, electronic information services, traditional and electronic exhibitions, and educational programs and publications.

Policy

1. The NMNH will provide reasonable access to its collections and collections information consistent with its stewardship responsibilities. Physical and intellectual access to the collections must be balanced against preservation and protection concerns.
2. In keeping with its stewardship responsibilities, NMNH will to control, monitor, and document access to and use of collections.
3. Staff responsible for providing physical access to collections, as authorized within each unit, must be familiar with the collections and their preservation needs.
4. NMNH collection users are required to demonstrate competence in handling collections, as appropriate, and also willingness to comply with security precautions or other restrictions.
 - 4.1. Access to the collections may be denied to individuals who have failed to handle items in accordance with NMNH approved practices and standard professional guidelines, especially when such past conduct has been noted in a written record and the individual officially informed at the time of the incident.
5. Access to collections and collections information may be restricted due to any of the following: resource limitations, security, object availability, cultural sensitivity, intellectual property rights, applicable restrictions, chain of custody issues or evidentiary concerns, loan agreements, and preservation constraints.
 - 5.1. The Collections Advisory Committee of each collecting unit is responsible for establishing standards for restricted access.
 - 5.1.1. As a general rule, members of the public are allowed access to the collections when resources and conditions allow, for specific legitimate reasons, e.g. to conduct selected research or to participate in prearranged formal educational activities.

6. NMNH collecting units may charge organizations or individuals from commercial and non-commercial entities access fees for NMNH owned intellectual property or materials, in accordance with guidelines set forth in the *SD 600 Implementation Manual*. This fee may be in addition to fees charged for reproduction, transportation, security, and conservation.
 - 6.1. Access fee schedules must be approved by the Director and the Under Secretary for Science.
 - 6.2. All such fees shall go into the funds of the unit for collections management costs.
7. The Smithsonian and NMNH are not subject to the Freedom of Information Act (FOIA), which governs access by the public to federal agency records. The Smithsonian follows the intent and spirit of the law as a matter of policy.
 - 7.1. All requests citing FOIA must be referred to the Office of General Counsel.
8. NMNH may charge a fee or royalty for granting permission to reproduce collection objects in books, journals, catalogues, magazines, and similar scholarly, commercial, or general publications.
 - 8.1. Fee schedules must be approved by the Director.
 - 8.2. All reproductions must be fully credited unless an alternate written agreement exists
9. Contracts for reproduction of any collection item must be approved by the Director or designee.
10. NMNH reserves the right to refuse to furnish photographs or objects intended for reproduction, and also, to the extent it may be entitled to do so, deny permission for such reproduction at its discretion, using criteria such as the following:
 - 10.1. The circumstances of the reproduction would be such as to demean, alter the appearance of, or otherwise misrepresent the collection item involved and/or bring discredit to the Smithsonian.
 - 10.2. It is determined that the reproduction work would cause harm to the object.
 - 10.3. The attribution of the collection item is in question.
11. NMNH acknowledges that the right to reproduce a collection item may be held by another individual or organization. In instances where such rights are believed to be held by a non-NMNH or Smithsonian party, the potential user will be notified and required to take full responsibility for obtaining any rights necessary for the intended use.
 - 11.1. The NMNH undertakes no responsibility for determining the nature of such right or for obtaining any permission on behalf of the potential user.
12. Private individuals are permitted to photograph collections items on display in public galleries when the collections items belongs to the NMNH.
 - 12.1. There are no other restrictions regarding such photography if the photographs are for personal use only, a hand-held camera with guarded flash or high speed film is used, and the photography is done at a distance of at least six feet from the collection items (see *SD 805: Handling Outside Permission Requests to Use Smithsonian Images and Schedule C*).

13. NMNH permits destructive analysis and sampling of collections items in accordance with established collecting unit policies and procedures and in compliance with any documented restrictions on use of the items. The importance of test results must be weighed against the total loss of the collection item and its value.
 - 13.1. Information gained from the analysis shall be provided to the collecting units and included in the museum's records.
14. NMNH collecting units may enter into agreements of restricted access at the request of Native American tribes (see Specific Legal and Ethical Issues), in connection with the repatriation process.
15. Electronic access to collections or collection documentation should be based on traditional principles guiding access to original objects and documents, and should serve to enhance the mission of the NMNH relative to access.
 - 15.1. Material provided through electronic access is subject to the same conditions and restrictions covering physical access and use of collections.
 - 15.2. Use of collection material obtained through electronic networks may not be used for illegal or unethical purposes.
16. NMNH generally has items in its care that are not the property of the Smithsonian. These items may include long-term loans; items borrowed for identification or evaluation, acquisition, study, or exhibition; or collections with shared custody and care.
 - 16.1. NMNH collecting units shall clearly address and respect access considerations, conditions, and restrictions in formal agreements with the property owner(s). Access to and use of such items is governed by agreements with the property owner(s).
17. Collections and collection documentation created as a result of research conducted by staff and non-Smithsonian staff working at NMNH is considered NMNH's property.
 - 17.1. NMNH may deny access to such collections and collection documentation if access would disrupt or compromise ongoing research.
18. Researchers and users of NMNH collections must acknowledge or credit the NMNH for providing information or collection access per collecting unit standards.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to control, monitor, document, and provide access to physical collections and collections information,
3. Incorporate applicable guidelines for access set forth in the *SD 600 Implementation Manual* and in NMNH's *Data Access Policy*.
4. Establish policies, criteria, and procedures for permitting responsible access to physical collections and collections information.

5. Establish written procedures and guidelines regarding proper use, handling and security of collections and associated documents.
6. Establish policies, criteria, and procedures regarding restricted access to collections.
7. Establish policies, criteria, and procedures for destructive analysis and sampling.
8. Establish appropriate policies and procedures for providing permission to publish or reproduce objects in collections ensuring authorities and responsibilities are clearly defined.
9. Establish policies and procedures regarding the appropriate credit line.

H. Loans and Borrows

Loan and Borrow transactions are the temporary transfer of possession of collection items for an agreed purpose and with the agreement that the collection item is returned at a specified time and in a specified condition. These transactions do not result in a change of ownership.

NMNH Loan: Under formal agreement, NMNH units temporarily relinquish custody of, but not any implied title to, collection items for temporary use, on condition that the items be returned or otherwise dealt with by a specific time and in a specified condition. A Loan may also be referred to as an **outgoing loan**.

NMNH Borrow: Under formal agreement, NMNH units obtain custody of, but not any implied title to, collection items for temporary use, on the condition that the items be returned or otherwise dealt with by a specific time. A Borrow may also be referred to as an **incoming loan**.

Principles

Lending and borrowing collection items for research, public exhibition, and education are an integral part of the NMNH's mission. Loan transactions between Smithsonian units are fundamental to Institutional programs, as are collections transactions to and from other educational and scientific organizations.

In general, loans of NMNH materials are not made to private individuals. Exceptions require the approval of the collecting unit chair and the Director. Authority is delegated to the Office of the Registrar to document, monitor, and maintain records on the status of loan transactions.

Authority is delegated to the Office of the Registrar to document, monitor, and maintain records on the status of loan transactions.

The NMNH adheres to the *Guidelines for Exhibiting Borrowed Objects* issued by the American Association of Museums (AAM). The text of the guidelines is included in the *SD 600 Implementation Manual*.

Policy

1. A collection item may be loaned or borrowed only in accordance with established authority and only when consistent with applicable law and professional ethics.
 - 1.1. All NMNH loans and borrows must adhere to applicable federal, state, local, and international laws, treaties, and regulations.
 - 1.2. All NMNH loans and borrows must be documented by a loan agreement or contract.
2. As a general rule, NMNH collections are lent for research, public exhibition, or educational purposes.
 - 2.1. NMNH collections may not be lent for private pecuniary gain. Collections may be lent for commercial purposes, provided that the proper approvals and contracts are in place.
 - 2.2. All loan transactions must be authorized and documented by a formal loan agreement or contract.
3. All regular borrow and loan agreements must be reviewed and approved by the collecting unit. Standard loan agreement forms must be reviewed by the Office of the Registrar and Office of General Counsel before use.
 - 3.1. Transactions of collections items governed by a contract may also require review and approval by the Director or designee, Office of General Counsel, and Office of Contracting.
4. All loan and borrow transactions are for a specified time period, with a specified party, with option for renewal as appropriate.
 - 4.1. The NMNH does not permit indefinite or permanent loans.
 - 4.2. Formal long-term repository or off-site enhancement programs may be set up as long-term loans. These must be reviewed and approved by the Office of the Registrar and the Office of General Counsel.
 - 4.3. NMNH may recall loans prior to the agreed-upon date in accordance to the loan agreement.
 - 4.4. Neither loaned nor borrowed items may be forwarded to a third party without prior written approval of the party who owns the items.
5. Access to collections borrowed by NMNH, as well as to NMNH collections on loan to or in the custody of others, must be stipulated in the transaction agreement.
6. With the approval of the Director, the NMNH may charge fees to borrowing organizations, and may recover actual expenses for making the outgoing loan.
 - 6.1. All such fees shall go into the funds of the lending unit for collections management costs.
7. The NMNH may be asked to lend collection items to high-ranking government officials according to guidelines established in the *SD 600 Implementation Manual*.
 - 7.1. Such loans must be approved by the collecting unit with notification to the Director.
 - 7.2. All such approved loans must be made through a direct arrangement with the appropriate curator or contact person in the agency or body requesting the loan, e.g., the House, Senate, White House, or government department, not by transacting solely with the borrowing official.

8. Outgoing loans that are part of a centrally-administered Smithsonian Affiliation agreement with another organization are subject to the Affiliation Policy adopted by the Board of Regents in September 1996, *SD 600*, and guidelines set forth in the *SD 600 Implementation Manual*.
 - 8.1. Other affiliations or partnerships between the NMNH and other organizations that are not Smithsonian Affiliates are subject to the terms of *SD 600* and this policy, as well as the procedures of the collecting unit loaning the items.
9. Regardless of the length and type of outgoing loan, the NMNH retains fiduciary responsibility for the continued oversight of its collections.
10. NMNH acknowledges its responsibility to provide appropriate physical safeguards for borrowed collections items in its custody, for the full term of the transaction agreement.
11. Loans between NMNH collecting units as well as to or with other Smithsonian units, must be documented according to established requirements in this policy, and must adhere to collecting units' policies and procedures.
 - 11.1. Responsibility for routine monitoring and preservation of transacted collection items must be established at the time the transaction agreement is initiated.
12. NMNH may deny loan requests at its discretion, in consideration of the following criteria:
 - 12.1. The items are being actively used by an NMNH researcher in the midst of a bona fide research project that has not yet been published
 - 12.2. The item(s) requested is on or scheduled for exhibition
 - 12.3. The requestor cannot provide proper facilities or fulfill standard preservation requirements
 - 12.4. The requested item(s) is of great scientific value or is unique
 - 12.5. The requested item is in such a condition that loaning it would place it at risk
 - 12.6. The requestor has previously violated the terms of a loan, including handling, sampling and/or return requirements
 - 12.7. Issues related to cultural sensitivity and/or repatriation mandate a restriction in access
 - 12.8. In the judgment of the collecting unit, the loan would compromise privacy, safety, or intellectual property rights.
 - 12.9. Inordinate costs and resources to satisfy the request
 - 12.10. Organizations and individuals whose loan requests have been denied may appeal to the Director or designee, who will make a final decision on the request.
13. Loaned NMNH collections items may only be sampled or consumed through destructive analysis or undergo conservation treatment with the prior written permission of the collecting unit that made the loan, according to unit procedures.

14. Collections items borrowed by NMNH may not be sampled or consumed through destructive analysis or undergo conservation treatment without the prior written permission of the owner.
15. The status of loans to NMNH which have expired, but for which the lender cannot be found, shall be resolved in accordance with the due process, reasonable search, and notification procedures set forth in the *SD 600 Implementation Manual*.
16. As part of its mission, NMNH makes its collections available to the public through loan for exhibition in a number of venues.
 - 16.1. The collecting unit will not allow any collection item to be exhibited to its detriment, or exhibited in such a way as to risk human health and safety or the integrity and stability of the item.
 - 16.2. The collecting unit establishes which items may be lent for exhibition, and also establishes the legal and physical conditions under which an item may be lent.
 - 16.2.1. The Collections Advisory Committee of the collecting unit makes recommendations for the resolution of disputes on exhibition of items, and forwards those to the Director.
 - 16.3. NMNH will be appropriately credited in the exhibition and in all supporting publications.
 - 16.4. Condition reporting requirements for exhibition of collections items are established by the collecting unit with the Office of the Registrar.
17. Unit Collections Advisory Committees shall establish guidelines for incoming loans to any unit members to ensure proper management of the borrowed items and use of the unit's resources. Ownership and custody information for all collection items must be recorded.
18. NMNH receives incoming loans of items for forensic identification and analysis from numerous medical, investigative and enforcement agencies. Such transactions are authorized, documented and managed according to Memoranda of Understanding (MOU) or other formal agreements with the referring agency.
 - 18.1. Items on loan to NMNH for forensic purposes are subject to the requirements of the applicable MOU or agreement, which supersede routine transaction policy and procedures. These may include stringent requirements regarding access to the item and all associated information as well as specialized requirements for storage, handling and conservation.
 - 18.2. NMNH recognizes the public value of its forensics services and accordingly upholds these requirements.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to approve, process, document, and monitor loans.

3. Incorporate applicable guidelines for loans set forth in the *SD 600 Implementation Manual*.
4. Establish policies, criteria, and procedures for lending and borrowing collections.
5. Apply the provisions of the AAM Guidelines specified above in its borrowing activities.
6. If loan fees will be charged, a unit policy must be established and approved by the Director.

The **Office of the Registrar** must:

1. Develop standard forms and maintain records of all loan transactions.

I. Intellectual Property Rights

Intellectual Property Rights are rights and protections based on federal or state statutes or common law such as patent, trademark, copyright, privacy, and publicity, as well as the moral rights of living artists as delineated in the Visual Artists Rights Act of 1990.

Principles

The NMNH is both a holder and a user of intellectual property and therefore seeks to protect the intellectual integrity of collections and promote wide access to collections for educational purposes. In support of its mission, the museum strives to protect the intellectual property rights of creators and intellectual property owners, including the museum itself as rights holder, and promote the responsible dissemination of knowledge.

Intellectual property rights are distinct from the right to possess the collection item itself and arise from its content. Holders of such rights may limit the uses that may be made of a collection item. The NMNH's ability to use collection items or associated intellectual property may be subject to intellectual property rights held by others.

The NMNH recognizes that under some circumstances and for some types of collections the establishment of intellectual property rights may be unclear at the time a collection item is accepted. It also recognizes that ownership of intellectual property rights may change over time for some collection items and under some circumstances. As a consequence, NMNH will make a reasonable, good faith effort to identify the holder of those intellectual property rights associated with a collection item at the time that collection item is accepted by the Museum.

Policy

1. NMNH will not knowingly permit infringement of intellectual property rights.
 - 1.1. The NMNH will make a good faith effort to protect the intellectual property rights of creators and intellectual property owners, including the museum itself as rights holder.

- 1.2. NMNH will adhere to the regulations of *SD 103* when considering ethics issues related to the establishment and handling of intellectual property rights associated with collections.
2. Fees may be charged to outside organizations and individuals for use of images and collection items only if such fees are established in accordance with *SD 805, Handling Outside Permission Requests to Use Smithsonian Images*, and the *SD 600 Implementation Manual*.
3. Reproductions of collections for standard museum purposes by the NMNH may be allowed by the doctrine of fair use.
 - 3.1. Fair use assessments will be made on a case-by-case basis by the unit Collections Advisory Committee. The Office of General Counsel should be consulted if there is any question regarding whether an intended use may be considered a fair use.
4. The NMNH may not claim intellectual property rights for items permanently transferred to other institutions, including duplicate items, unless such rights are expressly retained by the NMNH and mutually agreed upon by the recipient organization in writing at the time of the transfer.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority to approve permissible use of collection information and images and assign responsibility for rights management.
3. Follow applicable guidelines for intellectual property as set forth in *the SD 600 Implementation Manual*.
4. Establish policies and procedures to ascertain whether collection items or proposed acquisitions are encumbered by intellectual property rights or other restrictions and to determine what steps are required to obtain any rights necessary for the intended use of the item.
5. Establish policies and procedures for handling and documenting outside requests and permissions to publish or reproduce collections information and images in conformance with *SD 805, Handling Outside Permission Requests to Use Smithsonian Images*, and the *SD 600 Implementation Manual*.
6. Determine permissible uses of its collections information and images consistent with the mission of the Smithsonian and collecting unit and establish appropriate fee schedules according to NMNH policy.
7. Document intellectual property rights so that future users will have accurate information.
8. Ensure that collection records are consulted for possible restrictions or prohibitions to determine permissible image use and reproduction by the NMNH and others in all media formats.
9. Establish or identify a conflict resolution mechanism.

J. Specific Legal and Ethical Issues

NMNH acquires, holds, and manages collections to which particular legal and ethical issues apply. Because each collecting unit's holdings are different, and because certain types of collections present specific legal and ethical issues, each collecting unit will need to develop policies and procedures accordingly.

Native American and Native Hawaiian Human Remains and Objects

Principles

Native American and Native Hawaiian human remains, funerary objects, sacred objects, and objects of cultural patrimony are subject to the terms of the National Museum of the American Indian (NMAI) Act, as amended, 20 USC. § 80q. Under the NMAI Act the Smithsonian is required to compile information about such material, to disseminate the information to and consult with tribes about collections that may be subject to repatriation, and, in certain circumstances, to return such material to affiliated Native American tribes, Native Hawaiian groups, or lineal descendants.

The Smithsonian Repatriation Review Committee, established by the NMAI Act, serves as an advisory body to the Secretary or designee on application of the NMAI Act. The applicable NMAI Act standards and guidelines for compliance are set forth in the *SD 600 Implementation Manual*.

In addition to the applicable requirements of the NMAI Act, collecting units with Native American and Native Hawaiian collections should be aware of and sensitive to other issues that arise out of cultural concerns of Native American tribes or Native Hawaiian groups. Such concerns may relate to appropriate standards for the use and management of Native American or Native Hawaiian objects and interests in the intellectual content associated with such objects.

Collecting units are encouraged to consult with Native American tribes and Native Hawaiian groups associated with objects in their collections and to take their interests into account in establishing policies for the management of these collections, provided that such policies are consistent with applicable law and the Smithsonian's duties for the care and management of its collections.

Policy

1. NMNH collections include Native American or Native Hawaiian materials to which the requirements of the NMAI Act are applicable. NMNH and Smithsonian repatriation of Native American and Native Hawaiian human remains and objects is governed by the requirements set forth in the National Museum of the American Indian Act, 20 USC. § 80q (1989), as amended.
2. NMNH administers the Repatriation Office, which is the authority for NMNH under the NMAI Act and acts as the liaison between NMNH and any and all groups or individuals seeking discussion about or repatriation of any Smithsonian materials.

3. The NMNH Repatriation Office, established under the NMAI Act, evaluates all repatriation requests covered by the Act, assesses their validity and responds accordingly.
 - 3.1. Any repatriation request received by any NMNH unit should be referred to the NMNH Repatriation Office for advice and guidance.
4. Final repatriation decisions are made by the Secretary or designee. All repatriation decisions are subject to the general policies of the Board of Regents.
5. Any Native American or Native Hawaiian collections whose repatriation is not required by the NMAI Act shall be managed in accordance with this directive. Decisions to return or repatriate collection items outside the scope of the NMAI Act will be evaluated and processed in accordance with routine and established deaccession and disposition policies and criteria.

Implementation

1. The NMNH Repatriation Office is responsible for the development of written policies and procedures consistent with the legal requirements of the NMAI Act, as outlined in the *SD 600 Implementation Manual* and this document.
 - 1.1. The Repatriation Office has responsibility for any assessment of cultural affiliation, inventories, summaries, and responses required according to the NMAI Act.
 - 1.2. The Repatriation Office establishes authority and assigns responsibility to review, evaluate, document, and process repatriation requests and returns.
2. Each collecting unit with present or potential repatriation concerns must consult with the Repatriation Office to establish authority and assign responsibility to review proposed acquisitions for applicability.

Cultural Property

Principles

The *Smithsonian Institution Policy on Museum Acquisitions*, adopted by the Board of Regents on May 9, 1973, affirms the Smithsonian support for efforts of local, state, national, and international authorities to protect art, antiquities, national treasures, and ethnographic material from destructive exploitation.

The Smithsonian repudiates the illicit traffic in art and cultural objects that contributes to the despoliation of museums and monuments and the irreparable loss to science and humanity of archeological remains. Items that have been stolen, unscientifically gathered or excavated, or unethically acquired should not be made part of Smithsonian collections.

The *Policy on Museum Acquisitions* sets forth rules for the acquisition and borrowing of art, antiquities, and other items. The text of the Policy is included in *the SD 600 Implementation Manual*.

Policy

1. All collecting unit collections management policies and activities will comply with the *Smithsonian Institution Policy on Museum Acquisitions*.
2. Before acquiring or borrowing a collection item, the collecting unit must ascertain, from the circumstances surrounding the transaction or knowledge of the item's provenance, that the collection item was not stolen or wrongfully converted and is not illegally present in the United States.
3. Before acquiring or borrowing a collection item, the collecting unit must ascertain that the collection item was not unethically acquired from its source, unscientifically excavated, or illegally removed from its country of origin after May 9, 1973.
4. The provenance of collection items shall be a matter of public record, with the provision that provenance records and related information may be reasonably protected from non-approved access if there is reason to fear any breach of privacy or confidentiality, site vandalism, or theft.
5. Items related to named individuals or extant cultural groups shall be managed in a sensitive, respectful manner.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility for ensuring compliance with the *Policy on Museum Acquisitions*.
3. Incorporate applicable guidelines for acquiring, borrowing, and managing cultural property as set forth in the *SD 600 Implementation Manual*.

Biological Items

Principles

The Smithsonian has long been a leader in the effort to halt the continuing degradation of the world's natural history and environmental resources. Smithsonian research and collecting activities must be undertaken with sensitivity to continued protection of biological diversity and in compliance with applicable laws protecting animal and plant species, especially those that are threatened or endangered.

Field studies and collecting of biological material should be preceded by disclosure and consultation with the proper authorities and interested scientific institutions in the location of the fieldwork and under all appropriate permits.

Field activities must be conducted lawfully, support educational and scientific purposes, and not cause undue detriment to the biodiversity and ecological conditions in the area

of the activity other than in instances of salvage collecting in areas which will be destroyed by development projects or other endeavors sanctioned by the authorities of the country in question.

Policy

1. Biological items may be acquired by or on behalf of the NMNH through field collecting only when such collecting is legally authorized; the item is obtained solely for purposes of scientific research, to add to the Smithsonian collections, or for other educational purposes; and the Smithsonian's field activities will not cause undue detriment to the biodiversity and ecological conditions in the area of the activity.
2. The NMNH name may not be used to justify or support permit applications for activities that have not been authorized by or on behalf of the NMNH in accordance with this policy, the *SD 600 Implementation Manual*, and collecting unit policy.
3. NMNH will only acquire or borrow biological items collected or obtained by others if to the best of our knowledge the transaction complies with established unit standards and applicable international, national, state, local, and tribal laws.
4. Biological items in NMNH collections or custody will be managed in accordance with all applicable legal requirements, including collecting, transportation, shipping, documentation, access, and use requirements.
5. Authority and responsibility for obtaining and managing permits for museum-wide use are vested in the Director. Authority and responsibility for obtaining and managing collecting permits for specific biota, localities, or events is held by the Director and may be delegated to the relevant collecting unit within NMNH.
6. Biological collections shall only be used according to the terms of any agreements that permitted their acquisition.

Implementation

Each **collecting unit with responsibility for biological items** must:

1. Develop a collections management policy that confirms the Museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to approve, document, and ensure compliance with legal requirements for all biological items collections transactions.
3. Incorporate applicable guidelines for acquiring, borrowing, and managing biological items as set forth in the *SD 600 Implementation Manual*.

Unlawful Appropriation of Objects during the Nazi Era

Principles

Between 1933 and 1945, the Nazi Regime caused the unlawful appropriation of millions of art objects and other cultural property from their rightful owners, including private citizens; victims of the Holocaust; public and private museums and galleries; and religious, educational, and other institutions. Some of these objects ultimately were transferred, in good faith and without knowledge of their prior unlawful appropriation, through the legitimate market and may have been acquired by museums. In recent years, public awareness of the extent and significance of Nazi looting of cultural property has grown significantly.

The Smithsonian adheres to the *Guidelines Concerning the Unlawful Appropriation of Objects During the Nazi Era*, issued by the American Association of Museums (AAM), and, where applicable, the *Report of the Association of Art Museum (AAMD) Directors Task Force on the Spoilation of Art during the Nazi/World War II Era*. The text of these documents is included in the *SD 600 Implementation Manual*.

Policy

1. The NMNH shall not knowingly acquire collection items that were unlawfully appropriated during the Nazi era without subsequent restitution.
2. If the NMNH has acquired in good faith a collection item that is subsequently determined to have been unlawfully appropriated during the Nazi era without restitution, the NMNH will take prudent and necessary steps to resolve the status of the collection item.
3. Each collecting unit shall apply the applicable provisions of the AAM and AAMD guidelines to its collections management activities.

Implementation

Each **collecting unit** must:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to approve, document, and ensure compliance with Smithsonian policy on Nazi-appropriated objects and applicable guidelines.
3. Incorporate applicable guidelines concerning Nazi-appropriated objects as set forth in the *SD 600 Implementation Manual*.

Animal Welfare and the Institutional Animal Care and Use Committee

Principles

The Federal Animal Welfare Act (AWA) and the Public Health Service (PHS) Policy set standards for the responsible and humane treatment of animals captured alive in the field as well as those maintained in captivity. This includes standards for capture, restraint, handling, marking, captive care and euthanasia. Demonstration of compliance with AWA provisions is increasingly required by societies and peer-reviewed research journals.

The NMNH complies with the AWA in all units in which living animals are an essential subject of research, both in the field and in captivity. It will establish and maintain an Institutional Animal Care and Use Committee (IACUC) to review and advise on these issues, as required by Federal regulations.

Policy

1. The NMNH will not support or condone the use of any procedures that have been identified by the AWA and scientific discipline groups as being inhumane in the capture, restraint, handling, marking, captive care or euthanasia of living animals.
2. The NMNH will only maintain living animals for research purposes in fully acceptable captive care conditions, as determined by the IACUC and scientific discipline standards.
3. The NMNH will not knowingly accept specimens of animals collected for research purposes in violation of the humane requirements of the AWA.

Implementation

Each **collecting unit conducting activities covered by animal care and research guidelines** will:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to approve, document, and ensure compliance with Smithsonian policy and the AWA on animal welfare and applicable guidelines, including the establishment of an IACUC with a formal charge and regular meetings.
3. Delegate a representative of the unit to the NMNH interdisciplinary IACUC.

The **ADRC** must:

1. Approve collecting units' representatives or delegates.
2. Approve final actions and reports of NMNH interdisciplinary IACUC.

Human Subjects in Research and the Institutional Review Board

Federal research involving human subjects is governed by the Code of Federal Regulations, Title 45, Public Welfare, Part 46 (commonly referred to as 45 CFR 46).

Principles

NMNH complies with all legal and ethical requirements for responsible reliance on human subjects in any form of research undertaken by the NMNH. It will establish and maintain an Institutional Review Board (IRB) to review and advise on these issues, as required by Federal regulation. Any research that uses humans, surveys of human subjects, or human subjects' records requires IRB review and approval.

Policy

1. The NMNH will not support or condone the use of any procedures that have been identified by the National Institutes of Health, the National Science Foundation, and scientific discipline groups as being unacceptable in relation to human subjects of research.
2. The NMNH will only rely on human subjects in research under fully acceptable conditions, as determined by the IRB and scientific discipline standards.
3. The NMNH will not knowingly accept collections items or information derived from research conducted in violation of laws relating to the use of human subjects.

Implementation

Each **collecting unit conducting activities covered by human subject care and research guidelines** will:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
2. Establish authority and assign responsibility to approve, document, and ensure compliance with Smithsonian policy and Federal law on human subject research use guidelines, including the establishment of an IRB with a formal charge and regular meetings.
3. Delegate a representative of the unit to the NMNH interdisciplinary IRB.

The **ADRC** must:

1. Approve collecting units' representatives or delegates.
2. Approve final actions and reports of NMNH interdisciplinary IRB.

Collections Posing Health and Safety Risks

Principles

NMNH owns and has custody of items that may pose some risk to health and safety, either due to their inherent nature or construction, or as a result of post-collection alterations with hazardous materials. NMNH will provide awareness of the potential hazards, and of established protective work practices to those at risk. People at potential risk, who need to receive occupational hazard awareness information, include Smithsonian employees, docents, interns, visiting researchers, and contractors who are in contact with these collections. In addition, people to whom NMNH loans, deaccessions, or transfers objects with hazardous materials will also be notified. The visiting public will be protected from adverse health or safety risk from objects on display. NMNH protects the environment from undue contamination through proper disposal of waste materials generated during curation, treatment, and management of NMNH collections.

Policy

1. NMNH shall comply with the Smithsonian Hazard Communication Program (see *SD 419*), Smithsonian authorities, and all applicable laws in the handling, storage, shipping, transport, fumigation, and transacting of such items, and in the event of their disposal.
2. Collecting units must make reasonable attempts to determine the presence of hazardous materials within collections.
 - 2.1. Once a hazard is identified, employee health risk must be determined.
 - 2.1.1. Results must be communicated to affected staff.
 - 2.1.2. Appropriate labeling must be used to warn users of potential risk.
 - 2.1.3. Storage methods must be appropriate to the risk.
3. Written *Safe Work Practices* and storage procedures must be developed for the particular needs of the collecting unit or program.
4. All staff, docents, interns, visiting researchers, and private contractors who are responsible for handling, caring for, or otherwise managing such items will be informed of any known risks, and must be provided with appropriate procedures, materials, and equipment for mitigating the risks of managing those collections.
5. Collecting units shall ensure that hazard notification, to the extent applicable, is incorporated into loan, accession and de-accession, transfers and surpluses, and repatriation documents.
6. The Shipping Office or other properly trained staff is responsible for ensuring that hazardous materials shipped on behalf of NMNH are packed, shipped and transported as required by applicable laws and international treaties. Incoming loan and accession agreements should also include a description, from the sender, of any known or suspected hazardous material. Such documentation is to be in accordance with applicable law or international treaties. The Shipping Office will establish written guidance on the shipping and transport of hazardous/dangerous goods.

7. Employee health risk should be determined through occupational exposure surveys conducted by OSEM.
8. Communication of hazards to users must take the form of written fact sheets, incorporation of collections-based hazards into the basic NMNH Hazard Communication Training program, and/or information labels or signs on collections labels, storage cases, storage rows, or entry doors to storage.

Implementation

Each **collecting unit** will:

1. Develop a collections management policy that confirms the museum's policy and addresses or amplifies any area of collections management unique to the collections under the unit's oversight. Procedural and implementation elements, including the points below, should be documented.
 2. Assign responsibility for assessing, reporting and monitoring collections posing health and safety risks.
 3. Assign responsibility for developing and using notification methods and products appropriate to the risks and potentially affected parties.
 4. Incorporate applicable guidelines from relevant Smithsonian policies into the collecting unit's collections management policy.
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