

National Museum of American History, Behring Center

Collections Management Policy

Updated December 19, 2012

I. Mission

A. Museum Mission Statement

The National Museum of American History, Behring Center (NMAH) dedicates its collections and scholarship to inspiring a broader understanding of our nation and its many peoples. We create learning opportunities, stimulate imaginations, and present challenging ideas about our country's past.

B. Collections and the Museum Mission

Collections are fundamental to the mission of NMAH. Collections are the building blocks of research, exhibitions, publications, educational programs, and loans. They are shared with audiences within the Museum, nationally, and worldwide.

The Museum actively adds to its collections and thereby enhances its capabilities for research and interpretation. In acquiring and preserving collections the Museum acknowledges its responsibility to the American Public, for whom the legacy of material culture is held in trust.

Sound scholarship and careful documentation of collections assures that the investment in their acquisition and preservation will receive maximum return in the future, as items are studied and displayed.

Strict accountability in all aspects of collections management is essential to the Museum's trust responsibility.

C. Collections Program Mission

Balanced collections management serves to enhance public access to and use of the collections through scholarly research, exhibitions, and public educational programs, while ensuring that sufficient safeguards are in place for proper preservation of the collections.

This Collections Management Policy and related Institutional policies and procedures guide the Museum's Collection Program. The program includes planning, acquiring, researching, and providing for the preservation, proper use, control, and documentation of the objects held in the public trust. It ensures that appropriate museum practices and legal requirements are observed.

II. Delegation

The Director of the National Museum of American History, Behring Center (NMAH), is responsible to the Smithsonian Institution (SI) Under Secretary for History, Art, and Culture; Secretary; and Board of Regents for the prudent management of the National Collections. The Director exercises this responsibility through the Associate Director for Curatorial Affairs, who delegates specific aspects of the responsibility to Office of Curatorial Affairs staff. The Associate Director for Curatorial Affairs enforces the elements of the CMP.

All delegations are in writing, either as part of position descriptions, performance plans, or memoranda.

III. Ethics

The National Museum of American History, Behring Center (NMAH), recognizes and accepts its fiduciary responsibility to provide proper management, preservation, and use of the collections and associated information it holds for the benefit of the public.

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

Under no circumstances does NMAH staff provide an appraisal of objects to donors or potential donors.

Museum staff are discouraged from bringing personally owned objects of the type collected by NMAH into the Museum except for purposes of study, exhibition, or office decoration. All objects brought into the Museum as office decoration are clearly marked or otherwise identified as such. Unless present in the Museum for exhibition or study purposes, NMAH does not insure objects personally owned by staff.

IV. Scope of Collections and Collection Development

A. Scope of Collections

NMAH, one of the most comprehensive collections in the world, holds the national collection for the social, cultural, economic, scientific, and technological history of the peoples of the United States. The Museum's artifacts, including its extensive archival holdings, represent the origins and development of the United States. Changing historical perspectives and understandings guide new acquisition efforts and are reflected in their results.

The Museum collects artifacts associated with the people who lived and traveled within the current geographic boundaries of the United States from the 17th through the 21st centuries. Artifacts from earlier time periods through the 21st century, which were made and used in other parts of the world, are collected when they show the origins of, or provide developmental context for, the holdings of the Museum.

The National Numismatic Collection seeks to present history through money and medals. Therefore its collection is worldwide in scope and extends from traditional, non-coin media to paper money, credit cards, and other contemporary monetary forms.

B. Collections Plan

1. Authority to Collect

Delegated authority to collect is documented through Office of Curatorial Affairs staff position descriptions and performance plans. Decisions regarding all potential acquisitions and disposals support the Museum's approved Collections Plan. Acquisition of collections is at the discretion of those with delegated authority to collect, except as noted in section V.B.2.

2. Collections Plan

The Associate Director for Curatorial Affairs manages the development, implementation, and monitoring of the Museum's Collections Plan, which defines the goals for and assessments of the Museum's collection. The Plan supports the mission, goals, and objectives of the Museum and the thematic needs of its research, exhibition, and public programs.

C. Collections Committee

The Collections Committee acts as an advisory body to the Associate Director for Curatorial Affairs on collection development. The Committee reviews activities under its jurisdiction, recommending specific decisions and actions to the Associate Director for Curatorial Affairs. Activities under the jurisdiction of the Collections Committee are identified in the following sections of this Policy: Acquisitions, Outgoing Loans, Deaccessions, and Disposals.

V. Acquisitions

A. Definitions

Acquisition is the act of gaining legal title to a collection item or group of items. NMAH holds registered and unregistered acquisitions.

1. **Registered Collections:** Objects collected and held for an indefinite period of time, important to the Museum's collecting, research, and educational functions. Two categories have been defined:
 - a. **Accessioned Collections:** Objects collected with the intent of long-term preservation.
 - b. **Non-accessioned acquisition:** Objects collected for near-term use and media containing information relating to specific objects or subject areas. Three categories have been defined:
 - **Speculative Collections:** Objects being considered for addition to the accessioned collections but for which a final determination cannot be made for one or more of the following reasons:
 - The condition is such that a better or more complete example is preferable.
 - The significance of the object is still uncertain.
 - **Hands-on Collections:** Objects designated for use in educational activities, which are handled under the control or supervision of Museum staff and volunteers. It is understood that such objects suffer wear and damage over time.
 - **Reference Materials:** Written, printed, electronic, or other media containing recorded information relating to specific objects or subject areas collected for long-term preservation.
2. **Unregistered Collections:** Objects kept for limited time periods or for use as spare parts for other objects. Three categories have been defined:
 - a. **Spare parts:** Objects not in immediate or regular use but held in reserve for eventual use, such as spare parts for operating machinery.
 - b. **Props:** Objects acquired for a specific use for a limited time period to enhance a particular Museum activity, such as an exhibition or public program.
 - c. **Reference Material:** Written, printed, electronic, or other media containing recorded information relating to specific objects or subject areas, which usually duplicate material found in other repositories.

B. Reviewing Proposed Acquisitions

1. General Criteria: All objects intended for the Museum's collection are reviewed prior to acquisition, with the following considerations in mind:
 - a. Consistency with the goals of the Smithsonian Institution and the Museum's Collections Plan.
 - b. Provenance, legal title, intellectual property rights. NMAH observes the highest legal and ethical standards in the acquisition of collections. Reasonable inquiries into the provenance of collection items under consideration for acquisition are made to determine that the Museum can acquire a valid title to the collection item, including determining:
 - that objects were not stolen or wrongfully converted and are not illegally present in the United States.
 - that objects were not unethically acquired from sources, unscientifically excavated, nor illegally removed from countries of origin after May 9, 1973.
 - that objects were not unlawfully appropriated during the Nazi era without subsequent restitution.
 - c. Physical condition, preservation requirements, and storage needs, including problems presented by inherent hazards to staff or surroundings caused by material composition (such as radioactive, toxic, or explosive materials).
 - d. Research and documentation requirements in relationship to current staff expertise.
 - e. Direct acquisition costs: transportation, purchase, conservation, storage, cataloging. If a purchase, whether the particular or a similar object(s) may be obtained by gift, bequest, or loan, and whether the price is fair and reasonable.
 - f. Potential for the appearance of giving the Smithsonian Institution's commercial, political, or intellectual endorsement.
2. Collections Committee Review: It is required that the Collections Committee review and make a recommendation of approval to the Associate Director for Curatorial Affairs, and that the Associate Director for Curatorial Affairs approve the following proposed acquisitions
 - a. Objects, singly or grouped, with an estimated value of \$5,000 or more. An independent appraisal is required for objects that are offered for sale at a price in excess of \$25,000.
 - b. Objects, singly or grouped, that exceed 10 cubic feet and archival material exceeding 5 linear feet.
 - c. Transactions containing more than 50 objects, except for archival materials.
 - d. Objects, singly or grouped, for which packing, transportation, storage, or conservation costs exceed \$500.
 - e. Objects offered by NMAH staff, or relatives of staff, for which the value, as estimated by the donor, exceeds \$100. If the cumulative value of gifts from one staff member, or a relative of a staff member, exceeds \$500 within one calendar year, the Committee must review all of the gifts from that donor given in that calendar year.

- f. Purchases from present and former staff and their relatives.
 - g. Objects offered with restrictions (see section V.C.3).
 - h. Purchases from a single source with a total cost exceeding \$500.
 - i. Objects which require substantial resources beyond NMAH's allocated budget, or substantial resources of other Smithsonian units, for the management or preservation of the collection. In such cases, NMAH also consults with the Under Secretary for History, Art, and Culture; Secretary.
3. Parallel Collecting and Conflicts:
- a. Among the various Smithsonian collecting units, some overlap in collecting is inevitable; however, competition for a particular acquisition is inappropriate. When acquisition conflicts arise between NMAH and another SI museum or office, the Director of NMAH and the Director of the other SI unit must agree on which unit will acquire the collection item. The acquisition proposal is referred to the Under Secretary for History, Art, and Culture; Secretary and the appropriate Under Secretaries for a decision in those rare cases when the directors cannot resolve the placement of a collection item.
 - b. NMAH avoids competitive bidding with federal organizations for collection items of common interest and seeks mutually acceptable agreements whenever the potential for competitive bidding with such organizations becomes apparent.
 - c. Among museums nation-wide, overlap in collecting is inevitable. However, competition for a particular acquisition, when known, is neither to the benefit of the museums involved nor the publics they serve. When acquisition conflicts arise between NMAH and another museum, the Director of NMAH will contact the Director(s) of the other museum(s) in an effort to reach agreement on how to resolve the competition.

C. Terms of Acquisition

1. All applicable federal, state, local, international and tribal laws, treaties, regulations, and conventions are observed and compliance documented.
2. As a general rule, collection items are acquired with the intention of long-term preservation. However, no guarantee is made that any acquisition will be retained in perpetuity.
3. As a general rule, NMAH only acquires unrestricted collections. Exceptions must be reviewed and a recommendation for approval made to the Associate Director for Curatorial Affairs by the Collections Committee--and approved by the Associate Director for Curatorial Affairs.
4. No commitment is made regarding exhibition, interpretation, or placement of objects.
5. All acquisitions are subject to NMAH policies regarding acknowledgement in exhibits.

6. All acquisitions are subject to SI and NMAH policies on the use of the Institution's name and the Museum's name in publicity.

D. Documenting Legal Transfer of Title

1. To effect full, legal transfer of title, appropriate contracts, deeds, invoices, and other appropriate forms and documents are executed for each acquisition transaction. The type of transaction—gift, bequest, purchase, transfer from other SI units, or transfer from U.S. Government agencies, determines the appropriate document(s).
2. All gifts and bequests are acknowledged in writing to the donor or estate.
3. The NMAH Registrar signs IRS form 8283 for Noncash Charitable Donations on behalf of the Museum.
4. For Bargain Sales, NMAH acknowledges, to the vendor, receipt of outside appraisals or other legitimate evidence of fair market value. NMAH forwards, to the vendor, a letter of acknowledgement written according to SI Office of General Counsel guidance.

E. Accountability (see Section VI)

1. An object is officially registered when both a registration number is assigned and legal title is obtained.
 - a. The intended use or purpose of an object is identified at the time of acquisition.
 - b. Any future change to the use or purpose is explained and justified in writing.
 - c. Actual use by the Museum does not compromise the intended use or purpose of the acquisition.
2. A catalog number is applied to registered objects within 20 working days of physical receipt. An identification number is applied to unregistered collections within 20 working days of physical receipt.
3. Registration files are completed within 90 working days following transfer of legal title of registered collections. All original documentation relating to registered collections is submitted to Collections Management Services as part of the Museum's official file.
4. A CIS object record that meets the Museum's minimum inventory standards is completed for all new acquisitions within one year of receipt of an object, unless other deadlines for completing the work have been made.
5. Original documentation for unregistered collections is maintained in the unit of the Office of Curatorial Affairs or the Office of Public Programs that holds the collection, and is maintained as proof of transfer of legal title to the Museum.

6. If at the time of initial acquisition a collector believes that the above timeframes cannot be met, then an extension is requested for the specific item(s) in question. The request includes the projected date by which the work will be completed. The appropriate unit head in and Associate Director for the Office of Curatorial Affairs approve requests for extensions related to the registered and unregistered collections held by that Office. The appropriate unit head in and Associate Director for the Office of Public Programs approve requests for extensions related to the unregistered collections held by that Office. The NMAH Registrar monitors the timely completion of the work.

VI. Deaccessioning

A. Definitions

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

B. Reviewing Proposed Deaccessions

1. General Criteria for Deaccessioning: Objects are registered as "Accessioned Collections" according to the Museum's Collections Plan, with the intent of long-term preservation. Periodic review of accessioned collections may result in the removal of certain objects from this curatorial category and their placement in other registered or nonregistered curatorial categories. NMAH reviews proposed deaccessions using the following criteria:
 - a. The object is outside the scope of the Museum's Collections Plan.
 - b. A better example of the object type has been accessioned.
 - c. The object has deteriorated or is damaged beyond repair.
 - d. The object contains hazardous elements and disposal is necessary.
 - e. Repatriation.
2. NMAH Review: Collections Committee review and unanimous approval, and the approval of the Associate Director for Curatorial Affairs, is required for all proposed deaccessions. The following is provided:
 - a. Collections Management Services provides written confirmation that no restrictions exist in the registration file that affect the deaccessioning of the object.
 - b. All NMAH curators and chairs are given the opportunity to review and provide written comments for deaccession proposals.
 - c. Written opinions from at least 2 disinterested experts are obtained for proposed deaccessions valued at over \$50,000. These opinions address the objects relevance to the Museum's Collections Plan.
5. SI Review: If the estimated value of a single collection item or a group of collection items considered for deaccession is:
 - a. More than \$100,000, two written, independent appraisals or informed estimates of fair market value and approval of the deaccession from the Office of the General Counsel; the Under Secretary for History, Art, and Culture; and the Secretary is obtained.
 - b. More than \$500,000, two written, independent appraisals or informed estimates of fair market value and approval of the disposal from the Office of the General Counsel; the Under Secretary for History, Art, and Culture; the Secretary; and the Board of Regents is obtained.

C. Deaccession Dispositions

The following are approved dispositions for deaccessioned objects and are in order of preference:

1. Use by NMAH for educational programming in tours, outreach, or demonstrations.
2. Use by NMAH as replacement part(s) for accessioned objects.
3. Use by NMAH in conservation treatment mock-ups.
4. Disposal.

D. Accountability

1. All original documentation relating to deaccession actions is submitted to Collections Management Services for addition to the official registration file.
2. Collections Management Services monitors the disposition of deaccessions. The request must be resubmitted to the Collections Committee if no action takes place within 2 years.

VII. Disposal

A. Definitions

Disposal is the act of physically removing a collection item or group of items from the Museum's collections. Disposal may include transfer of legal title to another party.

B. Reviewing Proposed Disposals

1. General Criteria for Disposals: The Museum is aware of its role as trustee of the collections for the benefit of the American public. Objects are acquired with the intent of long-term retention and not with the intent of quick disposal. However, when it is deemed prudent to do so, disposal of objects is considered. NMAH reviews proposed disposals using the following criteria:
 - a. The object is no longer relevant to the purposes and activities of the Museum.
 - b. The object is endangered by the Museum's inability to properly preserve it.
 - c. The object has deteriorated beyond usefulness or contains elements which present a hazard to staff and the public.
 - d. Disposal provides the means for improving or strengthening the collections or otherwise furthering the goals of the Museum.
 - e. Repatriation.
2. NMAH Review:
 - a. Disposal of accessioned collections is considered only if the collections are approved for deaccessioning.
 - b. The approval of the Associate Director for Curatorial Affairs is required for all disposals.
 - c. Collections Committee review and unanimous approval is required for the disposal of all registered and unregistered collections with a value of \$10,000 or more. A written, independent appraisal or informed estimate of fair market value is obtained for single collection items or a group of collection items with an estimated value of more than \$10,000.
 - d. Collections Committee review and unanimous approval is required for disposals that are the result of repatriation requests.
3. SI Review: If the estimated value of a single collection item or a group of collection items considered for disposal is
 - a. More than \$100,000, two written, independent appraisals or informed estimates of fair market value and approval of the disposal from the Office of the General Counsel; the Under Secretary for History, Art, and Culture; and the Secretary is obtained.
 - b. More than \$500,000, two written, independent appraisals or informed estimates of fair market value and approval of the disposal from the Office of the General Counsel; the Under Secretary for History, Art, and Culture; the Secretary; and the Board of Regents is obtained.

6. Repatriation of Native American and Native Hawaiian objects:
 - a. Repatriation is governed by the requirements set forth in the *National Museum of the American Indian Act, 20 U.S.C. § 80q (1989), as amended.*
 - b. The Secretary or his designee makes final repatriation decisions.
 - c. All repatriation decisions are subject to the general policies of the Board of Regents.
 - d. The NMAH Registrar is responsible for maintaining an inventory of Native American and Native Hawaiian objects in the NMAH collections and for documenting and processing repatriation requests.
7. NMAH adheres to the *Guidelines Concerning the Unlawful Appropriation of Objects During the Nazi Era*, issued by the American Alliance of Museums. Prudent and necessary steps are taken to resolve the legal status of objects acquired in good faith and later determined to have been unlawfully appropriated during the Nazi era without restitution.
8. Emergency disposals recommended by Office of Curatorial Affairs units and the Office of Environmental Monitoring and Safety proceed without further review. The NMAH staff involved documents such disposals.

C. Disposal Actions

1. All applicable federal, state, local, international, and tribal laws, treaties, and regulations and any other applicable restrictions are observed and documented.
2. The following are approved dispositions for disposals and are in order of preference:
 - a. Repatriation when required.
 - b. Transfer to another SI museum or office for legitimate educational use. Smithsonian collecting units have a right of first refusal for collection items approved for disposal, except as otherwise stipulated by authorizing legislation or other restrictions. Such transfers are without financial compensation, except when NMAH disposes of a collection item acquired through purchase.
 - c. Exchange with another museum or educational institution for an object to be accessioned into NMAH collection.
 - d. Donation to another museum or educational institution which intends to make it generally accessible to the public. NMAH retains the right of first refusal if and when the recipient institution disposes of the object(s).
 - e. Sale, preferably at public auction. Proceeds realized from the disposal of collection items must be designated for additional collection acquisitions.
 - f. Witnessed destruction. Destruction of registered and unregistered collections held by the Office of Curatorial Affairs is certified by the responsible curator and a representative of Collections Management Services. Destruction of unregistered collections held by the Office of Public Programs is certified by the staff involved and a representative of Collections Management Services.
 - g. A written justification, with an explanation of the reasons for not using one of the preceding methods, is required if another method of disposal is proposed. Any other

method of disposal for collections requires the approval of the Associate Director for Curatorial Affairs, with recommendation from the involved Office of Curatorial Affairs (for registered and unregistered collections held by that Office) or Office of Public Programs staff (for unregistered collections held by that Office) and the Assistant Director for Collections Management Services.

D. Accountability

3. All original documentation relating to disposal actions is submitted to Collections Management Services for addition to the Museum's official file.
4. As required by law, the NMAH Registrar informs the IRS and the donor, using IRS form 8282, when disposal occurs within 2 years of a donation reported to the IRS, using IRS form 8283.
5. Collections Management Services monitors the disposition of disposals. The request must be resubmitted to the Collections Committee if no action takes place within 2 years.
6. The SI Office of the General Counsel reviews the use of the names of the Smithsonian Institution and its units by receiving organizations or in public auction.
7. Under no circumstances shall ownership of NMAH collections be transferred to any SI employee, volunteer, intern, fellow, visiting professional, or their relatives.

VIII. Preservation

A. Definitions

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 encompasses environmental control, conservation treatment, and collection maintenance. Preservation is an ongoing process with the goal of making collections available for current and future use.

B. Standards

NMAH provides the necessary preservation, protection, and security for all collections acquired, borrowed, and in the custody of the Institution, including their associated information.

1. NMAH supports and promotes the goals for collection preservation as stated in the professional codes of ethics for museums, curators, registrars, and conservators.
2. NMAH balances current research and educational use with the preservation requirements of collection items to ensure that collections are maintained for future generations and rightfully serve their intended purpose.

C. Environmental Controls

Environmental controls are applied for objects in storage, on exhibition, within public program areas, in transit, and in collection processing areas.

1. Space and resources needed to provide the proper environment for an object are identified and committed at the time of acquisition.
2. Environmental conditions appropriate to the preservation of the object are identified, monitored, and maintained at all times within the limits of available facilities.
3. Preventive and protective measures are taken and proper materials used to minimize the damaging effects of the environment.

D. Conservation Treatment

1. Any conservation intervention, restoration, destructive sampling, or consumptive use of collection items is authorized, documented, and justified—in writing—for the purpose of preservation or professional scholarship. The purpose, anticipated benefits, and potential risks of any proposed treatment are identified, justified, and recorded to ensure the integrity and preservation of the object.

2. Written permission is obtained from the responsible Museum unit or current legal owner prior to any object treatment.
3. Only those with appropriate levels of skills and supervision treat collections.
4. Priorities for treatment are established and reviewed based upon established guidelines, Museum program priorities, and periodic review of collections.

E. Collection Maintenance

1. Only designated, authorized NMAH staff handle objects without supervision.
2. Collections are properly supported and housed in storage, on exhibit, within public program areas, in transit, and in collection processing areas using the best techniques and materials available.
3. All suspected hazardous materials are labeled.

F. Authority and Responsibility

1. The Assistant Director for Collections Management Services is responsible for developing, implementing, and monitoring a coordinated Collection Preservation Program for NMAH, within the constraints of available facilities and resources. Priorities within the Collection Preservation Program come from Museum programmatic priorities.
2. Department of History staff, in consultation with Collections Management Services staff, has responsibility for the care and maintenance of objects in storage and on exhibit in the American History building.
3. Collections Management Services staff, in consultation with Department of History staff, has responsibility for the care and maintenance of objects stored at off-site facilities, objects being packed and shipped, and objects undergoing conservation treatment.

G. Accountability

1. All original documentation relating to the preservation of collections is submitted to Collections Management Services for addition to the Museum's official file.
2. Conservation records meet at least the minimum standards published by the American Institute for Conservation.

IX. Collections Information

A. Definitions

Collections information documents the intellectual significance, physical characteristics, and legal status of collection items, as well as the collections management processes and transactions they undergo. Maintaining collections information is part of an ongoing process with documentation residing in a combination of paper records, the NMAH Collections Information System (CIS) and media formats. The NMAH CIS is the museum's central data repository for recording, managing, and maintaining information about the collections as part of responsible stewardship, and through which collections information is made accessible to the public via digital media and networks.

B. Content Requirements

1. All original documents establishing right and/or title to objects are forwarded to Collections Management Services for the official registration file.
2. The Museum's official registration file minimally contains the following acquisition or loan information, as applicable for each object:
 - a. Registration transaction number.
 - b. Object number.
 - c. Object name, title/proper name, and classification.
 - d. Number of disjoint parts.
 - e. Legal status and sufficient provenance data to establish legal status. The provenance of acquired collection items is a matter of public record.
 - f. If owned by the Museum, whether title is acquired by gift, bequest, purchase, transfer, or exchange.
 - g. From whom the object is acquired or borrowed.
 - h. Credit line.
 - i. Responsible NMAH curatorial unit.
 - j. Physical description.
 - k. Reason for acquisition or loan.
 - l. Damage, loss, and conservation documentation.
3. All original documentation relating to an object's involvement in Museum collections management processes and public program activities is submitted to Collections Management Services for addition to the Museum's official registration file.
4. The Museum's CIS is the system of record for collections information. Basic accountability information contained in the official registration file also is contained in an object's CIS record, or the record references the information in the Museum's official registration file.
5. Department of History staff are responsible for ensuring that objects assigned to their units bear catalog numbers and have entries in the CIS.

C. Information Preservation

NMAH recognizes the importance and interdependent nature of objects and related documentation. One cannot be provided without the other. An object without documentation has little scholarly value and records without objects serve no museum purpose. Therefore, the records and other documentary materials, which support the collections, are considered equally important and require the same degree of care and consideration.

1. All media containing collections information is maintained for long-term use and is preserved according to current archival and information technology policy and standards.
2. All documentation is organized and maintained for easy access and preservation of information.

D. Authority and Responsibility

1. The Associate Director for Curatorial Affairs ensures museum adherence to all elements of the Collections Documentation Program.
2. The Assistant Director for Collections Management Services is responsible for developing, implementing, and monitoring a coordinated Collections Documentation Program for NMAH, within the constraints of available resources. Priorities within the Collections Information Management Program come from Museum programmatic priorities.
3. The Assistant Director for Collections Management Services is responsible for developing, implementing, and monitoring a coordinated Collections Documentation Program for NMAH, within the constraints of available resources. Priorities within the Collections Information Management Program come from Museum programmatic priorities.
4. Collections Management Services administers and safeguards the official registration records of the Museum.
5. Collections Management Services administers and safeguards the content of the Museum's CIS.
6. Department of History units administer and safeguard research and interpretive records documenting assigned objects.

E. Accountability

1. All documentation associated with the collections, or created by their use and activity, is kept current and complete.

X. Inventory

A. Definitions

Inventory is a record of a collection that identifies the objects and their current physical location; and the process of physically locating and identifying all or a selection of items for which the museum is responsible.

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.

National Treasures are a set of extremely valuable objects in the NMAH collections that are irreplaceable material representations of American history and culture. Collecting, preserving, interpreting, exhibiting, and sharing information about these objects is fundamental to fulfilling the museum's mission. National Treasures require a higher level of control and must be inventoried annually.

To be classified as National Treasures, objects must have national historical significance. They should represent people, ideas, events, experiences, and values that define the American Experience, and must meet two or more of the following criteria, based on curatorial assessment. The artifact must:

1. Be related to a highly important historical figure.
2. Be related to a highly significant historical event.
3. Represent or demonstrate a highly significant scientific, technological, cultural, military, political, or commercial innovation or achievement.
4. Represent or demonstrate highly significant artistic value or design achievement that also has major historical significance.
5. Be unique, extremely rare, or of high material value, and also have major historical significance.

B. Inventory Maintenance

The Museum's inventory of its collection is maintained through routine additions to and updating of the CIS.

1. For objects located within NMAH facilities, the Museum's CIS is the system of record for maintaining object information and object locations to the room or exhibit, and may be used for recording more specific locations.
2. For objects located at non-NMAH facilities, the Museum's CIS is the system of record for maintaining object information, including locations to the facility. The facility manager and/or borrower is responsible for maintaining more specific locations.
3. Object relocations are recorded in the CIS at the time an object is moved.

C. Cyclical Inventories

1. NMAH collection inventories are guided by a two-part, sequenced policy for gaining control and accountability over the collections:
 - a. Full inventory control is established over the collections through prioritized projects.
 - b. As inventory control is gained, it is verified on a rotational schedule through cyclical spot-checks that are conducted within a five year period, unless
 - i. another schedule has been set and is documented for the record.
 - ii. the objects are designated as “National Treasures”.
 - (1) National Treasures are inventoried 100% on a yearly basis, with no exceptions.
2. NMAH policy requires that collections inventories being conducted
 - a. Use the museum’s defined processes.
 - b. Use the NMAH CIS for documentation.
 - c. Adhere to NMAH inventory data standards for text and images.
 - d. Involve staff from the Department of History and Department of Collections Management Services.
 - i. Collections inventories may also include collections inventory contractors.
3. Collections inventory data standards and processes are described in the NMAH Collections Inventory Guidelines.
4. All loans to the Museum are inventoried fully at the time of loan renewal or loan termination.

D. Reconciliation

CIS records are reconciled with previously existing records when an object is first involved in any of the following:

1. Off-site relocations.
2. NMAH public programs.
3. NMAH exhibits.
4. Outgoing loans.

E. Authority and Responsibility

1. The Associate Director for Curatorial Affairs ensures museum adherence to all elements of the Cyclical Inventory Plan.

2. The Assistant Director for Collections Management Services is responsible for developing, implementing, and monitoring a coordinated Cyclical Inventory Plan for NMAH, within the constraints of available resources. Priorities within the Plan come from Museum programmatic priorities.
3. Department of History unit staff manage assigned AHB collection storage areas and record object movement into, within, and out of these storage areas using the CIS.
4. Collections Management Services manages the Museum's off-site storage facilities and records object movement into, within, and out of these off-site facilities using the CIS. It manages the Museum's shipping and packing facility and records object movement into and out of AHB.
5. Exhibit project staff manage exhibition staging areas and the installation and deinstallation of objects using the CIS. Project staff record object movement into, within, and out of exhibit staging areas and exhibit sections.

F. Accountability

1. The CIS is the repository for information related to collections inventory and reconciliation.
2. Collection Documentation Services, Collections Management Services staff are never assigned physical control over any NMAH object. Staff with delete privileges in the CIS do not have key and card reader access to the collections.

XI. Risk Management and Security

Risk management and insurance is coordinated at the Smithsonian by Risk Management in the Office of the Chief Financial Officer and governed by SD 108, *Insurance and Risk Management*. Security is coordinated at the Smithsonian by the Office of Protection Services.

A. Definitions

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.

B. Insurance

1. NMAH collections are not insured while they are in the care and possession of Smithsonian units.
2. Collections on loan to NMAH are insured as stipulated by authorized loan agreements or negotiated contracts, unless the lender waives insurance coverage.
3. Objects left in the temporary custody of the Museum are not insured, unless their value exceeds \$1,000.
4. NMAH collections are insured while in transit and while on loan to non-Smithsonian borrowers.
 - a. Waiver of insurance coverage is subject to review by the curator and approval of the Manager of the Outgoing Loan Office.
 - b. Insurance cannot be waived for any object whose value is over \$5,000.

C. Damage and Loss

1. NMAH staff report damage and loss, as soon as it is discovered, to Collections Management Services, the appropriate Department of History unit, and the NMAH Security Office.
2. Collections Management Services reports damage or loss of collections to the Office of the Treasurer Risk Management Division.
3. NMAH staff who discover damage or loss to the collections prepare and submit written reports to Collections Management Services for the Museum's official registration file.
4. Proceeds from the settlement of an insurance claim are used for conservation and restoration of the damaged object(s). Proceeds received because of total loss of an object, or in excess of the cost of conservation of a damaged object, are designated for collections acquisition.

D. Security

1. All collections are secured in controlled areas appropriate to the nature of the collection, the facility, and the activity involved. Access and movement are monitored and recorded.
2. The CIS system and files are backed up to tape on a nightly basis and stored in an offsite location. Backup is handled by OCIO.
3. Collections are routinely monitored and examined for damage and loss.

E. Disaster Preparedness

The Museum maintains a disaster preparedness program that includes planning, response, and recovery from major disasters, as well as evaluation and assessment following an incident.

1. The Museum's Disaster Preparedness Plan is followed in all emergencies involving the safety of visitors, personnel, and collections.
2. All staff are aware of their responsibilities in the event of a disaster and are adequately trained to respond.
3. Priorities are established for evacuation and treatment of collections in the event of a disaster.
4. Personal safety takes place over the collections.

F. Authority and Responsibility

1. The Assistant Director for Collections Management Services is responsible for developing, implementing, and monitoring the Museum's Disaster Preparedness Program.
2. The Manager of the Outgoing Loan Office administers collections insurance and ensures that loan agreements effect coverage. The Registrar handles insurance claims, maintains related records, and provides appropriate reports to NMAH senior management.

G. Accountability

All documentation associated with collection insurance, damage and loss, security measures, and disaster recovery is submitted to Collections Management Services for the Museum's registration files. The documentation is forwarded either as hard copy reports or as notations in the appropriate CIS records.

XII. Access

A. Definitions

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

B. Access to Collections

1. NMAH provides reasonable access to its collections consistent with its stewardship responsibilities.
2. Physical and intellectual access to the collections is balanced against preservation and protection concerns.
3. In keeping with its stewardship responsibilities, NMAH controls, monitors, and documents all access to and use of collections.
4. Access to collections may be restricted due to resource limitations, security, object availability, intellectual property rights, applicable restrictions, and preservation constraints.

C. Access to Collections Information

1. The Smithsonian Institution is 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. All requests citing FOIA must be referred to the Office of General Counsel.
2. The Museum provides the widest dissemination of collection information consistent with the stewardship responsibilities for its collections, associated documentation, and intellectual property rights. Sensitive information involving privacy, collecting localities, intellectual property restrictions, security, and restricted use are not made publicly available. The following are not divulged except to those persons with a right to know:
 - a. names of donors, lenders, and prior holders who expressly request anonymity.
 - b. mailing addresses of all donors, lenders, and prior holders.
 - c. location of objects not on public display.
 - d. monetary value of objects.

D. Access to Collections Storage and Accession File Storage

1. SD 600 defines access as the opportunity for the general public, scholars, and Smithsonian staff to utilize the diverse collection resources of the Smithsonian Institution. Prudent collections management requires identification and elimination, or reduction of risks to the collections, while balancing staff and public interests. In keeping with its stewardship responsibilities, NMAH controls, monitors, and documents all access to and use of collections. The museum access policy for collections storage

and the accession files manages risk, promotes efficient and sensible internal operations, and serves the public.

2. The policy on access to collections storage and accession file storage is detailed in a separate document (Access Policy: Collections Storage and Accession File Storage) as an addendum to the museum's Collections Management Policy.

E. Authority and Responsibility

1. Department of History staff is responsible for approving access to collections and, in consultation with Collections Management Services staff, to collections information.
2. The Public Affairs Office is informed of all requests for access to collections and collections information by the media.

XIII. Loans

A. Definition

A *loan* is the temporary physical transfer of collection items for an agreed purpose and on the condition that the collection item is returned at a specified time. Loans do not involve a change in ownership.

B. General Criteria

1. All loans to or from NMAH adhere to applicable federal, state, local, and international laws, treaties, and regulations.
2. Incoming and outgoing loans, with the exception of outgoing loans to SI Affiliates, are for specific periods of time not to exceed three years, with the option to renew if appropriate.
3. Written loan agreements are executed between NMAH and its borrowers and lenders prior to shipment or receipt of the object(s).
 - a. Special loan terms are set for collections or objects of a special nature and/or high sensitivity.
4. Written conservation surveys, supported by photographic documentation as necessary, are made for all loans entering or leaving the Museum.
5. Insurance amounts for objects borrowed and lent are based upon fair market values.
6. The names of the Smithsonian Institution and NMAH cannot be used in connection with any loan without the written permission of NMAH.

C. Incoming

1. Objects are borrowed only for public exhibition, research, and other educational purposes.
2. The lender's written permission is required for any repairs, alterations, or conservation treatment of borrowed objects.

D. Outgoing

1. Collections are lent for public exhibition, research, and other educational purposes.
2. Collections are not lent for commercial purposes or gain, for private pecuniary gain, or to individuals for personal use.

3. NMAH objects are displayed in areas clearly separate from commercial or for-profit areas of activity.
4. The educational or scholarly purpose of loans to for-profit organizations, that charge admission, is documented by the borrower and is reviewed by NMAH to determine whether the request meets NMAH's educational and scholarly criteria.
5. Loans to high-ranking government officials follow the guidelines established in the SD 600 Implementation Manual.
6. Loans to organizations participating in the SI Affiliation Program are made for specific periods of time up to ten years, with option for renewal if appropriate.
7. Only objects that have been formally registered either as NMAH accessions or non-accessioned acquisitions are lent.
8. Objects are ranked for outgoing loans as follows:
 - Tier 1: non-accessioned objects, props, and reference materials
 - Tier 2: accessioned objects that are study or duplicates
 - Tier 3: accessioned objects that are unique, historically significant, fragile, or politically sensitive
 - Tier 4: national treasures or objects valued at over \$1 million
9. Property of others in NMAH's custody is lent only with the written permission of the owner.
10. Loans are made to borrowers with acceptable facilities and personnel with the skills and expertise necessary to handle the objects being lent.
11. Borrowers are be required to pay actual expenses related to processing a loan request.
12. Outgoing loans are insured at the borrower's expense.

E. Indefinite or Permanent Loans and Deposits To/From NMAH

1. NMAH does not permit indefinite or permanent loans.
2. Legacy transactions (that is, pre-1974) recorded as deposits, indefinite loans, or permanent loans are reviewed to confirm or determine legal ownership. (Note that the practice of accepting deposits, indefinite loans, or permanent loans was discontinued from 1974 on.)
3. A good-faith effort is made to locate lenders/borrowers in order to resolve the status of these loans.

4. Once a lender/borrower is located, the objects involved either are returned to the legal owner or placed on a current loan agreement.
5. Guidance is sought from SI General Counsel as necessary.

F. Temporary Custody and Unsolicited Objects

Objects may be left in the temporary custody of NMAH – Temporary Custody Objects—for identification, examination, conservation, photography, or potential acquisition or incoming loan. Unsolicited objects also may be received by NMAH for these reasons.

1. Temporary Custody Objects are registered within five days of physical receipts.
2. Written Temporary Custody Receipts are executed between NMAH and the owner of Temporary Custody Objects for specific periods of time not to exceed 90 days.
3. Temporary Custody Objects are not insured, unless the owner requires insurance, and then objects are placed on an incoming loan agreement.
4. Unsolicited objects are registered either as temporary custody objects, incoming loans, or acquisitions within five days of physical receipt.
5. Unsolicited objects, sent anonymously, are assumed to be offers of donation and may be accessioned with clear documentation of the circumstances of receipt.
6. Unwanted, unsolicited objects are returned to the sender, transmitted to another SI museum, transmitted to another educational institution, or destroyed in the presences of witnesses.
7. Notice of the intended disposition is sent to the sender, when known, and the disposition is executed 90 days after the notice is sent.

G. Authority and Responsibility

1. The Registrar has delegated authority to sign all incoming loan agreements on behalf of NMAH.
2. The Manager of the NMAH Outgoing Loan Program has delegated authority to sign all outgoing loan agreements on behalf of NMAH.
3. The lending of Tier 4 objects requires that the Collections Committee review and make a recommendation of approval to the Associate Director for Curatorial Affairs and to the NMAH Director. Both the Associate Director for Curatorial Affairs and the NMAH Director must approve the loan, prior to any commitments being made to potential borrowers.

4. Collections Management Services manages resolution of pre-1974 indefinite or permanent loans and deposits.
5. The Objects Processing Facility records and acknowledges receipt of all unsolicited objects.

H. Accountability

1. The terms of all loan agreements are documented and monitored by Collections Management Services.
2. All original documentation relating to the lending, borrowing, and processing of temporary custody and unsolicited objects is maintained by Collections Management Services in the Museum's official loan or acquisition records.
3. Basic information for managing loans is recorded and maintained in the CIS.

XIV. Intellectual Property Rights

NMAH collections contain objects that are subject to intellectual property rights that are owned by the Smithsonian or others. NMAH also borrows objects subject to intellectual property rights that are owned by others.

A. Definition

Intellectual property rights are rights and protections based on federal or state statutes or common law such as patent, trademark, copyright, privacy, and publicity.

B. General Criteria

1. Collections are managed in a manner that avoids any infringement of intellectual property rights while promoting the widest possible dissemination of information about the collections.
2. The intellectual property rights of creators and intellectual property owners, including the Institution itself as rights holder, are protected.
3. Potential users are notified when it is believed that the right to reproduce an object is held by another person or organization, and that NMAH undertakes no responsibility for determining the nature of such right or for obtaining whatever permission may be necessary to reproduce the object.
4. NMAH relies on the doctrine of fair use in making reproductions of collections for standard museum purposes, such as archival, research, educational, exhibition, and other similar uses.
5. Written contracts are required for all licensed reproductions of objects.

C. Photographic Reproductions

1. Unrestricted photographs of collection objects may be made available, by sale, to the public.
2. A fee or royalty may be charged for granting permission to reproduce objects in any publication, including in electronic media.
3. All reproductions are fully credited.

4. Photographs are not provided, and permission to create such reproductions denied, if:
 - a. The attribution of the object(s) is in question.
 - b. The circumstances of the reproduction would demean, alter the appearance of, or otherwise misrepresent the object.
 - c. The circumstances of the reproduction would discredit NMAH or the Smithsonian Institution.
5. The public may photograph objects on display with hand-held cameras and available light, except for objects on loan whose owners have expressly forbidden photography of their objects.
6. The public may photograph objects in storage, by special arrangement with NMAH staff who manage the involved storage area, with hand-held cameras and available light, except for objects on loan whose owners have expressly forbidden photography of their objects.
7. Photography, including motion-picture, or videotaping of objects on display, that may require special lighting, is permitted only:
 - a. under arrangements made by the Public Affairs Office,
 - b. with the consent of the responsible Office of Curatorial Affairs curatorial division, and
 - c. in consultation with Preservation Services to determine that such lighting will not harm the objects.

D. Authority and Responsibility

1. Contracts for licensed reproductions of objects are negotiated through Smithsonian Business Ventures.
2. OCA staff is responsible for developing, implementing, and monitoring a program for the management of intellectual property rights associated with the Museum's collections and collections borrowed from others.

E. Accountability

1. All original documentation related to intellectual property rights is submitted to Collections Management Services for addition to the official registration file.

XV. Policy Review and Revision

The Office of Curatorial Affairs formally reviews the contents of this document every five years. Any staff member may suggest changes to this policy. Suggested changes are forwarded to the Assistant Director for Collections Management Services, who maintains a file of suggested changes for inclusion in the review process. Minor changes are effected with the approval of the Associate Director for Curatorial Affairs. Substantial revisions of the policy require approval as stipulated in SI SD-600.

Exceptions to this policy may be granted by the Director, with the recommendation of the Associate Director for Curatorial Affairs.

1. Exceptions are requested through the Assistant Director for Collections Management Services, who determines and documents the impact of the requested exception.
2. Approved exceptions are filed and maintained by Collections Management Services.
3. Collections Management Services monitors adherence to exceptions.
4. All exceptions are reviewed every five years, when the Collections Management Policy is reviewed, for current relevancy and need.

XVII. Monitoring Compliance

The Associate Director for Curatorial Affairs has the authority to ensure compliance with this policy.

Each year, the Assistant Director for Collections Management Services reports on the status of collections management to the Smithsonian National Collections Program.