

INDIAN AFFAIRS MANUAL

1.1 Purpose. This chapter establishes the requirements and responsibilities of Bureau of Indian Affairs (BIA) central office and field staff for BIA Museum Program collections management. The BIA collection includes archeological artifacts, ethnographic objects, historic items, archives, and artwork, which are maintained to preserve the history of BIA, Indian schools, and Indian culture for present and future generations.

BIA is also responsible for compliance with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) concerning human remains, funerary objects, objects of cultural patrimony, and sacred objects in its collections. Whether cultural, natural, artistic, or historical, museum objects and collections are valuable for the information that they provide about processes, events, and interactions among cultures, individuals, and the environment.

1.2 Scope. This policy applies to all BIA offices and Bureau of Indian Education (BIE) schools that are responsible for managing museum collections, regardless of whether the collections are in the possession of the office or school.

1.3 Policy. It is the policy of BIA to:

- A. provide for the protection and conservation of museum objects to preserve their important ethnographic, historic, scientific, and/or artistic qualities;
- B. provide for the accountability of management activities associated with museum collections – including but not limited to planning, cataloging, accessioning, loans, housekeeping, preventive conservation, relocation, and rehousing – consistent with Federal and U. S. Department of the Interior (DOI) standards and requirements; and
- C. provide for public benefit and enjoyment by placing and interpreting museum objects within a broader context through research, analysis, and documentary records.

1.4 Authority.

A. Statutes and Regulations.

- 1) 16 U.S.C. §§ 470aa–mm, Archaeological Resources Protection Act of 1979, as amended (ARPA)
- 2) 16 U.S.C. §§ 3371-78, and 18 U.S.C. 42, The Lacey Act of 1900, as amended
- 3) 18 U.S.C. § 1866(b) – Historic, archeologic, or prehistoric items and antiquities

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- 4) 25 U.S.C. §§ 3001-3013, Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)
- 5) 44 U.S.C. § 2109, Preservation, arrangement, duplication, exhibition of Records
- 6) 44 U.S.C. § 31, Records Management by Federal Agencies
- 7) 54 U.S.C. § 300101 et seq., (National Historic Preservation Act of 1966, as amended (NHPA))
- 8) 54 U.S.C. §§ 312501-312508, – Preservation of Historical and Archeological Data (Archeological and Historic Preservation Act of 1974, as amended)
- 9) 54 U.S.C. §§ 320301-320303 Monuments, Ruins, Sites, and Objects of Antiquity (Act for the Preservation of American Antiquities of 1906 (Antiquities Act))
- 10) 25 CFR Part 262- Protection of Archaeological Resources
- 11) 36 CFR Part 79- Curation of Federally-Owned and Administered Archeological Collections
- 12) 41 CFR 101- Federal Property Management Regulations (FPMR)
- 13) 43 CFR Part 3- Preservation of American Antiquities
- 14) 43 CFR Part 7- Protection of Archaeological Resources
- 15) 43 CFR Part 10- Native American Graves Protection and Repatriation Act Regulations

B. Guidance.

- 1) 59 IAM 9: Native American Graves Protection and Repatriation
- 2) 410 Departmental Manual (DM) 1: Personal Property Management – Scope, Policies, and Responsibilities
- 3) 411 DM 1: Identifying and Managing Museum Property - Policy and Management Responsibilities for Museum Property

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- 4) DOI Museum Property Directives- multiple (current approved Directives are located at <https://www.doi.gov/museum/policy/Museum-Directives>);
- 5) Interior Property Management Directives (IPMD) (current approved IPMDs are located at https://www.doi.gov/pam/programs/property_management/Property-Management-Directives).

1.5 Responsibilities.

- A. **Assistant Secretary - Indian Affairs** discharges the duties of the Secretary with the authority and direct responsibility to protect and preserve Indian trust assets; and provides program and budget support to carry out IA and Departmental requirements as identified in policies and DMs.
- B. **Directors, BIA and BIE** are responsible for ensuring the appropriate organizational arrangements, resources, and personnel to implement 411 DM 1 and IA policies, standards, procedures and directives for accountability, reporting, and protection of museum collections housed in BIA and/or BIE facilities within their jurisdiction. The Directors serve as the Senior Accountable Officials for BIA museum collections housed within the BIA and BIE locations and as such, are held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings (see IPMD Sections 114-60.3 and 114-60.8).
- C. **Chief, Division of Property Management, Office of Facilities, Property and Safety Management (OFPSM)** is responsible for designating Regional Property Officers to conduct annual inventories for museum collections housed in BIA facilities, and submitting the associated annual certifications and reports to the appropriate BIA Regional Director/BIE Administrator and the BIA Museum Program Manager/Curator.
- D. **Chief, Division of Facilities Management and Construction, OFPSM** ensures facilities inspections for BIA Federal facilities housing museum collections occur no less than every three years. Facilities inspections must include standard elements identified in 411 DM 1 and the DOI Museum Property Directives, including those relating to fire detection and suppression; heating, ventilation and air conditioning (HVAC) systems; air filtration systems; structural integrity; etc. Facilities inspections promote preventative conservation through proper maintenance of the facilities housing museum collections. The Chief provides an annual summary of the inspected facilities' condition assessments, findings, and corrective actions to the BIA Museum Program Manager/Curator.

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- E. Chief, Division of Environmental and Cultural Resources Management, Office of Trust Services (OTS)** is responsible for the oversight of cultural and environmental resources management, which includes the BIA Museum Program. The Division Chief designates the Museum Program Manager/Curator and staff curators with appropriate training, knowledge, and experience for the oversight of the BIA Museum Program, and serves on the DOI Museum Property Executive Program Committee.
- F. BIA Museum Program Manager/Curator** establishes BIA Museum Program management policies and guidelines; prepares the Scope of Collection Statement and Collection Management Plan; manages and maintains BIA's Interior Collection Management System (ICMS); oversees the preservation and conservation of BIA museum collections; validates physical inventories and facilities condition assessments at Federal and non-Federal facilities housing BIA museum collections; supervises the BIA staff curators; and provides training to field staff in day-to-day museum collections management. The Museum Program Manager/Curator represents BIA on the Interior Museum Property Committee; serves as BIA's National/Chief Curator as required by 411 DM 1; submits mandatory annual reports to the Department; coordinates with the National NAGPRA Program for BIA's NAGPRA-related matters; and provides oversight for NAGPRA collections.
- G. BIA Staff Curators** perform technical duties in connection with managing the BIA museum collections; collaborate with BIA Regional Archeologists; and prepare museum management documents for units housing BIA museum collections. BIA staff curators conduct and/or verify site visit assessments and annual physical inventories of Federal and non-Federal facilities housing museum collections; monitor the use and care of the collections; maintain a nationwide database of information and documentation for the BIA collections; and train and provide technical assistance to field staff. Staff curators ensure that Departmental and BIA policy, guidance, and requirements are consistently implemented to properly accession, catalog, document, and account for museum collections. Staff curators conduct research and compile data, and prepare museum collections management reports.
- H. BIA Regional Directors** serve as the Regional Accountable Official for museum collections within their respective regions and as such, will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings. Regional Directors certify, to the BIA Museum Program Manager, the accuracy of the annual inventory and condition assessments of museum collections within their regions. The condition of museum objects depends on the condition of the facility housing the objects; i.e., poor conditions in a facility often lead to rapid object deterioration. Facilities must meet Departmental standards, as identified in 411 DM 1 and the DOI Museum Property Directives, for facilities housing

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museum collections. Regional Directors must designate Facility Field Staff to provide for day-to-day on-site management of museum collections in all locations housing such collections.

- I. **Agency Superintendents/Project Managers/BIA Field Representatives** serve as the Accountable Official for museum collections within their respective agencies, projects, and locations and as such, will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings. Superintendents certify to the BIA Museum Program Manager the accuracy of the annual inventory and condition assessments of museum collections housed within their jurisdiction; and designate staff to provide for day-to-day on-site management of museum collections.
- J. **BIE School Administrators/Principals** serve as the Accountable Official for museum collections within the respective school and as such, will be held financially liable for loss, damage, or destruction in the amount of such loss as prescribed by the Board of Survey procedures and findings. BIE Administrators/Principals certify to the BIA Museum Program Manager the accuracy of the annual inventory and condition assessment of museum collections housed within their jurisdiction; and designate staff to provide for day-to-day on-site management of museum collections housed at the school.
- K. **BIA Regional Property Officers** are responsible for conducting annual inventories for museum collections housed in BIA facilities, submitting the associated annual certifications and reports to the appropriate BIA Regional Director/BIE Administrator and to the BIA Museum Program Manager/Curator, and designating Custodial Property Officers.
- L. **Custodial Property Officers** manage the documentation of the BIA museum collections of all BIA and BIE locations within their respective regions. They ensure proper inventory completion of museum collections; issue DI-105, Receipt for Property forms to each accountable person; retain original DI-105 receipts for museum objects in all locations within their jurisdiction; and maintain all museum records and documentation.
- M. **BIA Facility Field Staff** provide for day-to-day on-site management of museum collections in all locations that house museum collections. Responsibilities include museum object safety, security, housekeeping, pest management, fire protection, and emergency management. Facility Field Staff are responsible for keeping the museum records for their area of accountability; notifying the Regional Director, Regional Property Officer, and Museum Program Manager of any loss, theft, damage, or

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destruction of museum objects upon discovery; and maintaining museum management plans. In some locations, especially in smaller offices, the Custodial Property Officer and the Facility Field Staff duties may be assigned to the same individual.

- N. **BIA Regional Archeologists** provide technical information to the Museum Program Manager/Curator and staff curators, and conduct physical inspections of repositories to assess the condition of museum collections. They offer technical expertise and assistance in the areas of archeology, anthropology, cultural resources, NAGPRA, and NHPA.

1.6 Definitions.

- A. **Accessioning** is the formal, documented process to legally add an object or a group of objects to a museum collection, thereby establishing legal title. A single accession transaction occurs when one or more objects are acquired in the same manner, from one source, and at one time.
- B. **Accountable Official** is a Federal government employee who is assigned overall responsibility for a specified group of personal property items, including museum collections, and is responsible for ensuring accountability.
- C. **Agreement** is a formal, written arrangement between two or more parties that identifies roles, responsibilities, and/or outcomes or products. For museum objects, agreements are most commonly used for long-term curation or exhibiting. Examples are a repository agreement or a loan agreement.
- D. **Cataloging** is the act of assigning a unique identifying catalog number to an object, or a group of objects, and completing descriptive documentation, including the physical description, condition, provenience, and other pertinent information in order to facilitate physical and intellectual access to the object(s) and the collections.
- E. **Collection Management Plan (CMP)** documents the unit's plan for the long-term care and preservation of its museum collections. The CMP must be reviewed and approved by the Museum Program Manager/Curator every five years at a minimum.
- F. **Conservation** reflects actions taken by a conservator for the long-term preservation of museum objects. Conservation activities include examination, documentation, treatment, and preventative care, supported by research and education. Preventive conservation employs non-intrusive action to prevent damage and to minimize the deterioration of objects. Such actions include monitoring and controlling agents of deterioration including light, relative humidity, temperature, dust, and pests; practicing

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proper object handling, storage, exhibit, packing, and shipping techniques; conducting regular museum housekeeping; and addressing the care of museum collections in an emergency management plan.

- G. Custodian** is a Federal government employee who is responsible for the daily control and oversight of personal property assigned to them.
- H. Inventory** is an itemized listing of objects (noun), or the act of physically locating museum objects and verifying the accuracy of the record (verb).
- I. Executive Program Committee (EPC)** is a chartered committee established to provide executive oversight of DOI museum collections and programs and the Interior Museum Property Committee. The primary purpose of the EPC is to oversee, evaluate, and direct Department-wide efforts to manage museum collections within the context of the Department's goals and objectives for personal property and resource management.
- J. Integrated Pest Management (IPM), Security, and Housekeeping Plans** are plans relating to management of pests, security, and housekeeping for locations housing museum collections.
- K. Interior Collection Management System (ICMS)** is the mandatory DOI information management system used to provide Department-wide consistency in accounting for, documenting, reporting on, and providing physical and intellectual access to bureau/office museum collections.
- L. Interior Museum Property Committee (IMPC)** is a chartered committee created to support responsible stewardship and use of DOI's museum collections. IMPC members represent the bureaus and offices which manage museum collections to ensure that the unique interests and situations of each bureau/office are fully represented at the Department level.
- M. Inventory** is an itemized listing of objects; and/or the act of physically locating all or a random sample of the objects for which a unit is responsible.
- N. Loan** is the temporary transfer of custody of museum objects on either a short-term (three years or less) or long-term basis. A loan must be for official purposes and may be incoming or outgoing. The terms of a loan are documented in a loan agreement or similar instrument (see C. "Agreement.")
- O. Museum Collection (previously called "museum property")** is a standardized term used by museum professionals to describe museum objects, and which consists of an

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assemblage of objects representing the disciplines of archeology, art, biology, ethnography, geology, history, and/or paleontology that are retained for long-term preservation, study, and interpretation consistent with statutory requirements, the relationship to BIA's mission, or other appropriate factors. A museum collection consists of all accessioned, unaccessioned, cataloged, and uncataloged objects which meet the criteria in the respective Scope of Collection Statement. Museum collections do not include items that are used for displaying museum objects, such as exhibit cases, dioramas, lighting, graphics, replicas, etc. BIA museum collections must be cataloged in ICMS (see DOI Museum Property Directive 1: Introduction to Managing Museum Collections for detailed information.)

- P. Museum Records** are records that are created to manage museum collections and include accession, catalog, loan, deaccession, and inventory records. These records must be appraised through BIA and DOI record schedule procedures. Museum records are not a part of BIA's museum collections.
- Q. Object** is a physical item in a museum collection, which may include a work of art, a historical object, archeological artifact, ethnographic object, archival item, and natural history specimen.
- R. Personal Property** is property of any kind, or an interest therein, except real property and records of the Federal government. Personal property includes all equipment, materials and supplies, and museum objects. It does not include property which is incorporated in, or permanently affixed to, real property.
- S. Repository** is a type of facility that is dedicated to managing, preserving, processing, studying, and storing museum collections according to professional museum and archival practices.
- T. Scope of Collection Statement (SOCS)** defines the purpose of the museum collection, identifies the parameters of collection activities, sets limits on collecting, and describes the uses and restrictions of the museum collection. A SOCS for each BIA location housing museum collections is reviewed and approved by the BIA Museum Program Manager/Curator every five years, at a minimum.
- U. Unit** is an organizational entity that houses and manages museum collections. This includes, but is not limited to, an administrative unit, museum, office, school, site, or other repository housing museum collections.

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1.7 Standards, Requirements, and Procedures. Standards for managing museum collections are based on Departmental policy in 411 DM 1, the DOI Museum Property Directives, and professional museum practices. These standards apply to all museum collections housed in Indian Affairs, BIA, BIE units, and in non-BIA repositories. The following describes the requirements to manage museum objects.

A. Acquiring and Identifying Museum Objects

BIA acquires museum objects through purchase, gift, donation, transfer, and field collection. Objects are evaluated by the BIA Museum Program Manager to determine whether they fit within the parameters of the applicable SOCS and can be properly cared for by BIA.

Once the BIA Museum Program Manager determines that an object meets these requirements, the object is then accessioned into the BIA Museum Program collections. All accessioned objects must be documented, managed, and preserved according to both DOI and BIA policy.

B. Documenting Museum Objects

BIA must document all museum objects in the ICMS database, as well as in paper records, with mandatory data. BIA staff must restrict access to sensitive data, especially specific locality and provenience information, to aid in protecting the resource and privacy.

- 1. Accessioning Standards.** The BIA Museum Program Manager must review and approve all accession actions. BIA must follow the standards identified in DOI Museum Property Directive 3: Required Standards for Documenting Museum Property.
- 2. Cataloging Standards.** BIA Museum Program staff must adhere to the standards in Directive 3, as well as additional BIA-specific guidelines, to document all BIA museum collections in ICMS.
- 3. Inventory Standards.**
 - a. Annual Inventories.** Regional Property Officers, Custodial Property Officers, and/or Facility Field Staff must physically verify the presence, location, and condition of museum objects listed in the inventory for museum objects located in BIA and BIE locations. BIA and/or BIE staff must complete the following annual inventories:
 - i. A 100% inventory of all controlled museum objects; and

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- ii. A 100% inventory of all museum objects, unless the BIA Museum Program Manager has approved an exception and an alternate plan for units holding large amounts of museum objects.
 - iii. A random sample inventory by accession number of all accessioned but uncataloged museum collections, unless a more stringent method is required by the BIA Museum Program Manager.
- b. Other Inventories.** BIA may need to conduct additional inventories under the following circumstances:
- i. A 100% inventory of all museum objects may be required when a Report of Survey or other indicator reveals that a number of objects are unaccounted for or a significant loss has occurred.
 - ii. A 100% inventory or a certification may be required when the designation of accountability changes (see 410 DM 1).
 - iii. During special audits or other circumstances.
- c. Mandatory Inventory Requirements.** For each object, the inventory must verify and update the:
- i. presence of the object;
 - ii. location of the object;
 - iii. accuracy of the object (catalog) number;
 - iv. accuracy of all other information; and
 - v. condition of the object.
- d. Reconciling Inventories.** BIA must reconcile the museum collection inventories with ICMS and museum records. Regional Property Officers, Custodial Property Officers, and/or Facility Field Staff must report to the BIA Museum Program Manager if objects not previously listed in museum records are found during an inventory. These objects will be evaluated for accession into the BIA museum collections per 1.7 A above. For missing museum objects BIA will:
- i. Contact law enforcement or other appropriate authorities;
 - ii. Process Reports of Survey (DI-103) in compliance with Interior Property Management Directive (IPMD) 114-60.803, Report of Survey; and, if applicable,
 - iii. Request that the Department's Office of Inspector General investigate the situation as described in 355 DM 2, Departmental Investigations, Policy

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for Investigating Complaints and Referrals, and IPMD 114-60.807, Survey Procedures, Property Irregularities.

- e. **Certifying Inventories.** Regional Property Officers, Custodial Property Officers, and/or Facility Field Staff must certify in writing to the BIA Museum Program Manager the status of annual inventories of museum collections. All certifications must be signed by the appropriate Accountable Official.
4. **Loan Standards.** Loans are made to further BIA's goals of research, preservation, interpretation, and access. Incoming loans are temporary transfers of custody of objects to a unit on a short-term or long-term basis. Incoming loans involve objects for which a unit has responsibility and custody, but not ownership. Outgoing loans are temporary transfers of custody of objects that are owned by BIA to another entity. General requirements are to:
- a. Loan BIA museum objects for official purposes only following review and approval by the BIA Museum Program Manager. Loans to private individuals are prohibited.
 - b. Ensure that the borrowing entity meets the standards in 411 DM 1 and the DOI Museum Property Directives prior to approving the loan.
 - c. Prohibit the use of museum objects for commercial purposes or private pecuniary gain.
 - d. All loans must be fully documented per the standards in Directive 3.

C. Standards to Preserve and Protect Museum Objects

The standards for managing and preserving museum collections are based on DOI policy as well as professional museum and archival standards. The DOI-required standards must be applied to all BIA museum collections. Museum collections must be housed in secure facilities with environmental controls appropriate to the predominant materials in a collection to reduce the rate of deterioration and prolong object life. BIA must use the standards identified in 411 DM 1 and in DOI Museum Property Directive 4: Required Standards for Managing and Preserving Museum Property for preventive conservation of museum objects in dedicated storage space, on exhibit, and in administrative offices.

1. **Environmental Standards.** Museum objects and associated documents must be housed in safe, stable environments, appropriate to the specific needs of the individual material type. This will reduce the rate of deterioration of the museum objects and minimize the need for conservation treatment. BIA must consider the

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goals of energy conservation in the decision-making process for controlling relative humidity and temperature. Directive 4 provides specific standards for temperature, relative humidity, light, and pest management.

2. **Security Standards.** Dedicated storage and exhibit spaces must be kept secure with access limited to curatorial staff and other authorized individuals. An appropriate combination of mechanical and electronic security systems must be used. An emergency management plan must address any special needs of the museum collections.
 - a. Administrative office spaces, including schools, in which museum objects are displayed must have adequate security measures including key control to office space and display cases; a means to prevent unauthorized access; and a record of access to and movement of museum objects in and out of office space(s).
3. **Fire Protection Standards.** Equipment and/or systems to detect and suppress fire must be installed in spaces housing museum collections. These systems must be appropriate to the types (materials) of museum collections in the space, and to the structure in which it is housed. A fire plan must address the needs of museum collections. Spaces housing museum collections must be made fire-resistant to the extent possible. Museum records must be stored in appropriate fire-resistant containers that are kept locked when not in use. Flammable liquids must not be stored in any areas housing museum collections.
 - a. Administrative office spaces, including schools, in which museum objects are displayed must have written procedures for safely evacuating museum collections that may be at risk due to an impending disaster, giving priority to human health and safety.
4. **Housekeeping, Physical Examination, and Conservation Treatment Standards.** A clean environment in storage and exhibit spaces must be maintained on a regular schedule to minimize or prevent the deterioration of museum collections.
 - a. BIA Museum Program staff must develop housekeeping plans for each location housing museum objects, and responsible Facility Field Staff in each location must conduct housekeeping of museum objects per the schedule and instructions in the housekeeping plan.
 - b. Museum objects must be examined regularly to check for evidence of deterioration. Standard occasions for physical examination are during an inventory or return of an object from display/exhibit to storage. The examination and findings must be documented in the museum records and reported to the BIA Museum Program Manager.

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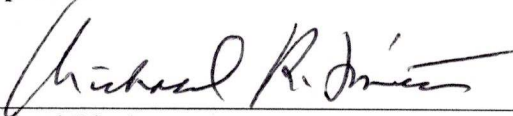
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- e. Three-dimensional objects must be secured and protected using appropriate mounts and/or pedestals, and must be kept locked in exhibit/display cases.
 - f. Textiles must be hung to distribute weight evenly and to avoid contact with metals and untreated wood, as well as with any glazing.
 - g. BIA Museum Program staff will remove museum objects from display or storage if the objects are found to be susceptible to deterioration or damage, or at the discretion of BIA Museum Program staff.
8. **Museum Site Visit Assessments.** BIA Museum Program staff must conduct periodic site visits to locations housing BIA museum collections to assess and document the condition of the facilities and objects.
9. **Use of Museum Collections.** Museum objects may be made available for scientific, cultural, or educational use, subject to such terms and conditions as are necessary for their protection and preservation.
- a. All requests for object use – including but not limited to consumptive (destructive), commercial, photographic, and publication use – must be made in writing to the BIA Museum Program Manager who will review the request and make the final decision.
 - b. All requests for use of cultural items subject to NAGPRA must be detailed in writing to the BIA Museum Program Manager and are subject to the standards and procedures stated in 59 IAM 9.
10. **Deaccessioning Standards.** BIA does not have disposition authority for museum objects with the exception of repatriation under NAGPRA. Reports of Survey due to loss, theft, damage, destruction, or abandonment (410 DM 1) may potentially lead to deaccessioning. All deaccessioning actions must be thoroughly documented following standards in Directive 3.

Approval

for 

Michael Black
Director, Bureau of Indian Affairs

8/30/2016

Date