



United States Department of the Interior



NATIONAL PARK SERVICE

National Mall and Memorial Parks

900 Ohio Drive, S.W.

Washington, D.C. 20024-2000

BELMONT-PAUL WOMEN'S EQUALITY NATIONAL MONUMENT

SCOPE OF COLLECTION STATEMENT

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TABLE OF CONTENTS

I. INTRODUCTION.....	1
A. Executive Summary.....	1
B. Purpose of the Scope of Collection Statement	2
C. Legislation Related to the National Park Service Museum Collections.....	2
D. Park History, Significance, Purpose, Themes and Goals.....	2
E. Laws, Regulations, and Conventions Related to Museum Collections	6
F. Structures, Landmarks and Park Resources Listed on National or International Registries	7
II. TYPES OF COLLECTIONS	7
A. Cultural Collection.....	7
1. Archeology Collection	8
2. Ethnology Collection	9
3. History Collection.....	9
4. Archive Collection.....	10
B. Natural History Collection.....	10
III. MUSEUM COLLECTIONS SUBJECT TO THE NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT OF 1990.....	10
IV. ACQUISITIONS	11
V. USES OF THE COLLECTION	12
VI. RESTRICTIONS.....	13
VII. MANAGEMENT ACTIONS	14

I. INTRODUCTION

A. Executive Summary

The Belmont-Paul Women's Equality National Monument (BEPA) honors the significant work of the National Woman's Party (NWP) and the tireless efforts of leaders Alva Belmont and Alice Paul. Belmont, Paul and other NWP advocates promoted and achieved political equality for women in 1920 with the passage of the 19th amendment to the United States Constitution, guaranteeing women's suffrage. The house was built as a private residence near Capitol Hill in 1820 and purchased by Belmont in 1929 to serve as the National Woman's Party headquarters. The NWP authored the Equal Rights Amendment, was a key supporter of the Fair Labor Standards Act, and contributed to the Civil Rights Act of 1964. In 1997, the NWP became a 501(c)(3) non-profit organization and, on April 12, 2016, the site was designated a national monument by Presidential Proclamation. The site is administered by the National Park Service (NPS) as a unit of the National Mall and Memorial Parks (NAMA).

The NWP owns and manages an exceptional collection of library, archival, and museum holdings that document the history, strategies, tactics, and accomplishments of the women's movement. The movement helped to secure women's suffrage and push for the passage of the Equal Rights Amendment. This collection will remain in the NWP's care and custody and any future offers of similar materials will be directed to the NWP. The NWP museum collection is exhibited on site at the Belmont-Paul House with portions in storage at the NPS National Capital Region's Museum Resource Center (MRCE) in Landover, Maryland; the Library of Congress; and Ely, Inc. in District Heights, Maryland.

The NPS will establish a BEPA museum collection for archaeology and architectural elements that are conveyed with the property, including light fixtures and mirrors. The BEPA collection, once established, will be stored at MRCE or remain on exhibit at the house. Any Resource Management records generated in part of or associated with BEPA will be accessioned and managed as part of the NAMA museum collection as mandated. Resource Management materials generated by NPS research and preservation projects document NPS management and maintenance of the site and will serve as the institutional memory of the site. The materials will also be used to inform management decisions.¹

For additional information on the museum collection, please contact:

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¹ *NPS Director's Order #24: Museum Collection Management* states that "NPS museum collections inform and enhance every aspect of the NPS mission, from resource management and interpretation, to research and public accountability. Featured in exhibits, interpretation and education programs, films, and print and electronic publications, NPS museum collections are key resources for educators, students, researchers, park managers, park neighbors, and the general public."

B. Purpose of the Scope of Collection Statement²

This Scope of Collection Statement (SOCS) defines the scope of present and future museum collection holdings for the Belmont-Paul Women's Equality National Monument. This stand-alone document ensures that materials collected contribute directly to the understanding and interpretation of the site's purpose, themes and resources, including those objects that the National Park Service (NPS) is legally mandated to preserve. It is designed to ensure that the museum collection is clearly relevant to the park by setting limits to protect the Belmont-Paul Women's Equality National Monument collection against arbitrary or excessive growth, and to confirm that the National Park Service is able to adequately care for the collection.

C. Legislation Related to the National Park Service Museum Collections

The National Park Service's legal mandate for acquiring and preserving museum collections is contained in the Antiquities Act of 1906 (54 USC 320301-320303); the Organic Act of 1916 (54 USC 100101(a) et seq.); the Historic Sites Act of 1935 (54 USC 320101); the Management of Museum Properties Act of 1955, as amended (54 USC 102501-102504); the Reservoir Salvage Act of 1960, as amended (16 USC 469-469c); the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq.); the Archeological and Historic Preservation Act of 1974, as amended (54 USC 312501-312508); the Archeological Resources Protection Act of 1979, as amended (16 USC 470aa-mm); and the National Parks Omnibus Management Act of 1998 (54 USC 100701 et seq.).

D. Park History, Significance, Purpose, Themes and Goals

1. Site History

The Belmont-Paul house, presently located at 144 Constitution Avenue NE, in Washington, DC, was originally constructed in 1800 by Robert Sewall as a private residence. Upon completion, the house was rented to several tenants, including Albert Gallatin, Thomas Jefferson's and James Madison's Secretary of the Treasury. The house was likely burned to the ground during the British invasion of Washington in August, 1814 and rebuilt by Sewall in 1820. The Flemish bond brick of the exterior and architectural detailing of the interior contrast greatly with the surrounding office buildings on Capitol Hill. A decorative stained glass window sits atop and along the front door, filtering colored light into house's the main hallway.

The Sewall family sold the house to Vermont Senator Porter Dale in 1922, after 120 years of ownership. In 1929, Alva Belmont, a wealthy, Alabamian feminist and member of the National American Woman Suffrage Association (NAWSA), and, ultimately, a leader of the National Woman's Party (NWP), purchased the house. The house became the headquarters for the National

² Preparation of a SOCS is required by *NPS Management Policies* (2006, Chapter 5); *Director's Order No. 24: NPS Museum Collections Management*; and *Director's Order No. 28: Cultural Resource Management*.

Woman's Party and, because of its proximity to the United States Capitol, a symbol of and haven for equality and non-violent civil disobedience in the heart of Washington.

The National Woman's Party emerged in 1917 as the principal organization dedicated to the enfranchisement of women in the United States and abroad. Alice Paul, founder of the NWP, courageously led the movement, believing that direct action, such as hosting suffrage parades, lobbying, picketing the White House, and hunger strikes, would garner support from President Woodrow Wilson. After years of protesting and campaigning, Alva Belmont and Alice Paul achieved their goal: the 19th amendment was added to the United States Constitution on August 26, 1920, guaranteeing women the right to vote. Alva Belmont became the president of the NWP after the passage of the 19th amendment and remained in this position until her death in 1933.

After the National Woman's Party secured women's suffrage, Alice Paul focused on authoring the Equal Rights Amendment (ERA), passing the Fair Labor Standards Act of 1964, and contributing to the Civil Rights Act of 1964. In all, the NWP challenged more than 600 pieces of legislation, effecting change in over 300 discriminatory regulations. The NWP became a 501(c)(3) non-profit organization in 1997, 20 years after Paul's death. Through the use of its historic feminist library and museum collection, the NWP continues to support gender equality by teaching the public about the history of the women's movement and its notable activists.

President Barack Obama designated the Belmont-Paul Women's Equality National Monument a national monument on April 12, 2016 by Presidential Proclamation. Ownership of the site transferred from the National Woman's Party to the National Park Service that same year and the site is now administered as a unit of the National Mall and Memorial Parks (NAMA).

The BEPA museum collection will document and commemorate the ongoing research, preservation and maintenance efforts at the monument, beginning with its dedication as a national monument in 2016 through the present. In addition, the BEPA museum collection will contain archaeology and original architectural elements. The collection will be managed by the curatorial staff of the National Mall and Memorial Parks and will be stored at the Museum Resource Center (MRCE) for its long-term preservation.

The National Woman's Party manages and cares for the collections of historic objects and archives relating to the suffrage movement and the Equal Rights Amendment that were in their care prior to the site's designation as a national monument. The NWP's vast museum collection includes the country's first feminist library, consisting of over 10,000 works; cartoon drawings; over 1,400 banners, sashes and capes used in parades and worn while picketing the White House; 60 paintings and sculptures of women suffrage leaders; and much more. Responsibility for the NWP collection will remain with the NWP and any potential donations of similar materials will be referred to the NWP.

2. Significance

The Belmont-Paul Women's Equality National Monument is the foremost memorial honoring the work of the National Woman's Party, a guiding influence in the fight for women's political, social and economic equality in the United States and internationally³. BEPA's *Foundation Document* (2017) identifies several statements of significance for the site:

- The National Woman's Party, founded in 1916, strategically selected its headquarters at 144 Constitution Avenue, NE in 1929. Blocks from the United States Capitol, this location served as the staging ground in the battle for women's equality – a legacy that endures today at the Belmont-Paul Women's Equality National Monument.
- The National Woman's Party continues to own and curate one of the largest collections related to women's suffrage and equal rights, including the first feminist library. This collection reflects the innovative political strategies and tactics that reinvigorated the suffrage movement and became a blueprint for civil rights organizations and activities throughout the 20th century and beyond.
- The National Woman's Party, from their headquarters, systematically targeted over 600 pieces of discriminatory legislation. Their efforts resulted in more than 300 legislative changes affecting marriage, divorce, custody laws, jury service, property rights, women's ability to enter into contracts, citizenship rights, the Fair Labor Standards Act of 1938 and the Civil Rights Act of 1964.
- Alice Paul, founder of the National Woman's Party, and one of the most influential leaders in the women's rights movement of the 20th century, was instrumental in the final phase of the campaign for the 19th Amendment to the United States Constitution, guaranteeing women the right to vote. She then authored the Equal Rights Amendment, dedicating the rest of her life to its passage and to worldwide equality for women.
- The Belmont-Paul Women's Equality National Monument, the National Woman's Party headquarters, was created by women for women as an empowering tactical center and home that continues to provide an active global forum for women to learn, mentor, and express their civic voice.⁴

³ BEPA *Foundation Document*, March 2017 Draft, Page 3.

⁴ BEPA *Foundation Document*, March 2017 Draft, Pages 5-6.

3. Purpose

The purpose of the Belmont-Paul Women's Equality National Monument is to recognize the contributions of the National Woman's Party in its campaign for women's equality. The *BEPA Foundation Document* (2017) identifies the following statement of purpose for the site:

The purpose of Belmont-Paul Women's Equality National Monument is to preserve and interpret the historic headquarters and story of the courageous activism of the National Woman's Party and the community of women committed to political, social, and economic equality, in order to inspire and engage current and future generations.⁵

The purpose of the Belmont-Paul Women's Equality National Monument museum collection is to preserve those materials directly related to the management, construction and preservation of the house and grounds. The BEPA collection does not contain objects relating to the work of Alva Belmont, Alice Paul, or the National Woman's Party; instead, the collection documents the management, construction and preservation of the monument.

4. Themes

The Monument's main interpretive themes were developed for the *BEPA Foundation Document* (2017):

- Community of women
- Action through legislation
- Non-violent civil disobedience
- The role of the National Woman's Party
- Women's movement history
- International influence⁶

The Belmont-Paul Women's Equality National Monument museum collection will focus on the management and preservation of the site.

5. Goals

- Support the site's resource management, interpretive program themes, and objectives.

⁵ *BEPA Foundation Document*, March 2017 Draft, Page 5.

⁶ *BEPA Foundation Document*, March 2017 Draft, Page 8-9.

- Identify, inventory, and assess the site's cultural and natural resources to form a basis for developing and implementing management strategies.
- Document and protect BEPA's cultural and natural resources to preserve the integrity of the site for the enjoyment of present and future generations.
- Provide information to the public through exhibits, publications, interpretive programs, web sites, online databases, and emerging communication methods.
- Support academic/scientific research through documentation, preservation and access.

E. Laws, Regulations, and Conventions Related to Museum Collections

NPS museum collections are subject to Service-wide NPS policies and guidelines. *NPS Management Policies* (2006) lay the foundation by which the NPS meets its responsibilities toward museum collections and provides policy standards and requirements for preserving, protecting, documenting, and providing access to, and use of, NPS museum collections. *Director's Order #28: NPS Cultural Resources Management Guideline* states, "The National Park Service permits and encourages the acquisition of museum objects by donation, purchase, exchange, transfer, field collecting, or loan when these objects are clearly significant to an area." *Director's Order #24: NPS Museum Collections Management* (2008) and the accompanying *Museum Handbook I-III* (1998-2006) ensure that NPS managers and staff have information on the standards and actions for successfully and ethically complying with *NPS Management Policies* (2006) regarding museum collections. These documents also provide a means of measuring and evaluating progress in preserving, protecting, documenting, accessing, and using museum collections. *Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-making* (2011) and the accompanying handbook create a method that the site is to follow for projects. The site is to follow the decision-making process laid out in *DO #12*, which includes impact analysis for museum collections. The process can also involve cultural resource surveys, including archeology. The objects associated with the archeological surveys are placed in the site museum collection for future curation and research. It is the responsibility of the site to preserve and protect the natural and cultural resources that might be impacted through site projects.

Archeological materials, except inalienable and communal property (as defined by the Native American Graves Protection and Repatriation Act of 1990 [25 USC 3001013]), recovered from within the site's boundaries through systematic collection are National Park Service property, must be retained in the site's museum collection in accordance with 43 CFR 7.13 and *NPS Management Policies* (2006).

In accordance with the NPS Research Permit and Reporting System, permits to collect natural resource specimens state that retained specimens remain Federal property and will be incorporated

into the site's museum collection. As stated in 36 CFR 2.5, any natural history specimen collection permits issued by the Superintendent require the following conditions: all specimens will bear official NPS museum labels and their catalog numbers will be registered in the NPS National Catalog; and specimens and data derived from consumed specimens will be made available to the public and reports and publications resulting from a research specimen collection permit will be filed with the Superintendent.

Other laws, regulations, directives, and conventions, pertinent to museum collections include: *Curation of Federally-owned and Administered Archeological Collections* (36 CFR Part 79, Section 79.10(c)); the Endangered Species Act of 1973, as amended (16 USC 1531 - 1543); the Bald Eagle Protection Act of 1940 (16 USC 668a); the Migratory Bird Treaty Act of 1918 (16 USC 703 - 711); the American Indian Religious Freedom Act of 1978 (42 USC 1996); Disposition of Federal Records, (36 CFR Part 1228); Preservation, Arrangement, Duplication, Exhibition of Records (44 USC 2109); NPS Special Directive 87-3, the 1983 Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES); the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property (implemented in the United States by P.L. 97-446 in 1983, 19 USC 2601); and Voluntarily Abandoned Property (41 CFR Part 102-41, Subpart C).

F. Structures, Landmarks and Park Resources Listed on National or International Registries

The Belmont-Paul Women's Equality National Monument was listed on the National Register of Historic Places (NRHP) on June 16, 1972 and documented on May 9, 1981 under NRHP# 72001432.

II. TYPES OF COLLECTIONS

The legal mandates, resource management objectives, and interpretive themes stated in *Section I* of this SOCS provide general direction for acquiring materials for BEPA's museum collection. National Park Service museum collections are divided into two main categories: cultural (comprised of archeology, ethnology, history, and archives) and natural (consisting of biology, geology, and paleontology). The guidelines identified in the following sections for each collecting category are intended to guide collecting and to prevent arbitrary and excessive growth of the site's museum collection, while ensuring that the collection remains relevant to BEPA's mission and purpose.

A. Cultural Collection

The Belmont-Paul Women's Equality National Monument museum collection is entirely a cultural collection. The collection functions to support the site's mission, resource management programs, academic/scientific research, interpretation and education. The collection provides baseline data of the site's cultural resources and documents changes these resources are undergoing because of

internal site conditions and external effects. To ensure that only relevant materials are accessioned into the cultural collection, future growth is restricted to those that fulfill the following:

- Needs identified in the site's approved planning documents and resource studies.
- Service-wide initiatives.
- Enhancing the understanding of and promoting increased stewardship of the site's cultural resources.
- Cultural resource baselines, inventorying, and monitoring activities.
- Regulatory and compliance activities such as those mandated by the National Historic Preservation Act of 1966, as amended, the Archeological Resources Protection Act of 1979, and the National Environmental Policy Act of 1970.
- Materials associated with major events that occur at the site in the future may be considered.

NPS cultural museum collections are subdivided into four disciplines: archeology, ethnology, history and archives. BEPA's cultural collection is currently comprised of archeology and history subcategories. As an administrative unit of NAMA, resource management records generated from BEPA are accessioned into the NAMA museum collection. Any historical artifacts and archives relating to the history of the women's movement is managed and cared for by the National Woman's Party.

1. Archeology Collection

Archeological collections are generated in response to cultural resource management requirements related to legal mandates and by research authorized under the Archeological Resources Protection Act of 1979 (ARPA), as amended (16 USC 470aa-mm). The archeology collection includes all artifacts and ecofacts recovered as part of archeological projects conducted within the site's boundaries.

Archeological materials recovered within the boundaries of the site and all associated documentation are the property of the United States and will be maintained in the museum collection in accordance with 43 CFR 7 and *NPS Management Policies* (2006) [except inalienable and communal property, as defined by NAGPRA]. Archeological materials may be recovered only by NPS archeologists or archeologists affiliated with approved institutions, in compliance with the Act for the Preservation of American Antiquities (34 Stat. 225) and ARPA, as amended (16 USC 470aa-mm). Artifacts and specimens recovered as a result of ARPA investigations become part of the collection once the case is closed.

Uncontrolled surface collecting by visitors or site staff is illegal according to the *Code of Federal Regulations, Title 36, Volume I* (36 CFR 2.1). Artifacts found on the surface should not be removed from their original location by the finder; instead, they should be reported to the Resource Manager of the site. If materials are turned in to the site, appropriate measures must be taken to ensure that the finder collects no more material; the precise provenience information is recorded, if possible; and the objects and data are delivered promptly to the site. Unless the items are determined to be archeologically significant by a professional archeologist, they should not be cataloged into the site's museum collection.

The BEPA collection will include a small collection of archaeology excavated while under NWP management. Future collections activity in this area will concentrate on the acquisition of artifacts and specimens excavated at the site through archeological research studies and compliance projects.

2. Ethnology Collection

At present, the site does not have ethnological materials in its museum collection, nor are any anticipated. Should collection of materials begin at BEPA, this sub collection would concentrate on the acquisition of outstanding examples of ethnological materials noted in the site's approved planning documents, which are currently not represented in the collection.

3. History Collection

The history collection is an important component of the interpretive and resource management programs and supports the site's mission and purpose. Priority for acquisition is given to documented site-related objects. When a large quantity of an object is available, priority is given to acquiring the best preserved example.

The following categories have been identified as collecting focuses for BEPA's history collection as developed from BEPA's legislation and *Foundation Document* (2017):

- a. Belmont-Paul Women's Equality National Monument Preservation History (2016-Present).** This sub category of collecting includes objects and artifacts that document or commemorate the ongoing preservation and maintenance efforts of the Belmont-Paul Women's Equality National Monument beginning with its dedication as a national monument in 2016 through the present.
- b. Architectural Elements (1820- Present).** This collection includes architectural elements that conveyed with the house as well as semi-permanent fixtures, such as chandeliers and mirrors. When original architectural fabric is removed from a historic structure during a

preservation or repair project, a representative portion is accessioned into the museum collection.

4. Archive Collection

Resource management records are defined in the Departmental Manual (*411 DM 1 Policy and Responsibilities for Management of Museum Property*), and may include hardcopy (paper) or any kind of magnetic, electronic, digital or film technology. Materials may include documents, manuscripts, drawings, field notes, films, laboratory reports, maps, oral histories, blueprints, photographic negatives, prints and slides, reports, and audio and video tapes that document the site's development, history, and/or mission. As an administrative unit of NAMA, BEPA resource management records are accessioned into the NAMA museum archival collection in order to retain their provenance and context. Archives documenting the history of the women's movement, including the first feminist library, are managed and cared for by the National Woman's Party.

NPS policy and procedures for archival collections and records management are outlined in *NPS Management Policies* (2006); *Director's Order #11D: Records and Electronic Information Management* (2012); the *Museum Handbook, Part II. Appendix D: Archives and Manuscript Collections* (2008), and the *NPS Records Disposition Schedule* (2010).

B. Natural History Collection

BEPA's museum collection does not have a natural history subcomponent. Any natural history specimens (biology, geology, or paleontology) generated or collected from BEPA are accessioned and managed as part of the NAMA museum collection.

III. MUSEUM COLLECTIONS SUBJECT TO THE NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT OF 1990

The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), 25 USC 3001-13, requires, in addition to other actions, a written summary of unassociated funerary objects, sacred objects, and objects of cultural patrimony. NAGPRA required an inventory of human remains and associated funerary objects to have been completed by November 16, 1995.

NAMA has determined that no BEPA museum collections fall within the scope NAGPRA. Acquisition of such objects by the site is not anticipated.

IV. ACQUISITIONS

NPS policy permits the acquisition of museum objects by gift, purchase, exchange, transfer, and field collection under the authorities of the Antiquities Act of 1906, the National Park Service Act of 1916, the Historic Sites Act of 1935, the Management of Museum Properties Act of 1955, and the Archeological Resources Protection Act of 1979, as amended. Acquisition of museum objects is governed by the appropriateness of the object to the Purpose, Themes and Goals set forth in sections 1.3-5 of this document as well as the park's ability to manage, preserve, and provide access to them according to *NPS Management Policies, Chapter 5* (2006); the standards for managing museum collections in *Director's Order #28: Cultural Resource Management* (1998); *Special Directive 80-1 Guidance for Meeting NPS Preservation and Protection Standards for Museum Collections* (1990); and the *NPS Museum Handbook I-III* (1998 – 2006). In accordance with NPS policy, the park will accept unrestricted gifts and bequests only with no limiting conditions, including copyright. Museum objects must be acquired, accessioned, and cataloged in accordance with the *NPS Museum Handbook, Part II: Museum Records* (2000).

All acquisitions must be collected, exported, imported, transported, or otherwise obtained and possessed in full compliance with the laws and regulations of the country of origin, the United States federal government (including NAGPRA), and the individual states of the United States.

In accordance with *Director's Order #44: Personal Property Management, Chapter 10* (2008), all proposals for the acquisition of firearms and ammunition, except archeological field collections, must be reviewed and approved by the Regional Curator. Acquisition of firearms included on the Bureau of Alcohol, Tobacco, Firearms and Explosives' list of prohibited and restricted weapons require concurrent review by the Regional Curator and the Regional Law Enforcement Specialist. All ammunition acquired must be certified as inert before it is brought onto the collection facility premises.

The Park Superintendent, by delegation, represents the Director of the National Park Service and the Secretary of the Interior in accepting title to and responsibility for museum collections. The Superintendent bears the ultimate responsibility for the acquisition and proper care and management of the museum collection. The Superintendent may delegate the day-to-day care of the collection to the Park's Curator. All acquisitions made by the Superintendent (or designated receiving officer) must be in accord with this approved Scope of Collection Statement.

All permanent acquisitions must receive formal approval from the site Superintendent before they can be accepted into the museum collection. Upon receipt, all newly acquired objects and related documentation must be turned over to the site's Museum Curator. The Museum Curator prepares for the Superintendent's signature, all instruments of conveyance, and letters of thanks, acceptance, or rejection, and transmits them as appropriate to the donor, lender, vendor, or other sources of acquisition.

V. USES OF THE COLLECTION

The BEPA museum collection may be used for exhibits, interpretive programs, research, and other interpretive media, such as publications focused on museum objects. The governing consideration on the use of museum objects is the conservation of each object in question and of the collection as a whole. The objects should be accurately interpreted to help people understand the events or circumstances related to them.

In accordance with *NPS Management Policies, Chapter 7* (2006), the park will not exhibit objects, or photographs of objects, that are subject to NAGPRA. There will be no display of grave goods or other objects that are culturally associated with Native Americans.

Researchers and other specialists may examine objects and archival materials under the conditions and procedures outlined in *Director's Order #24: NPS Museum Collections Management; Director's Order #28: Cultural Resource Management* (1998); *Cultural Resource Management Guideline* (1997); and in the Park's written *Museum Collections Access Procedures*. Outside researchers must submit a research proposal to the Superintendent for review by the park's Research Coordinator. Special care must be taken when granting access to this collection to protect private information as outlined in the *NPS Museum Handbook, Part III, Chapter 1: Evaluating and Documenting Museum Collections Use*.

Any and all uses of materials from the BEPA collection will be consistent with the preservation standards set out in *Director's Order #28: Guideline for Cultural Resource Management* (1998). Any consumptive or destructive use will comply with the requirements and restrictions on such use detailed in *Director's Order #24: NPS Museum Collections Management; Director's Order #28: Cultural Resource Management* (1998); *Cultural Resource Management Guideline* (1997); and *Director's Order #6: Interpretation and Education* (2005). The use of reproductions is preferred to the consumptive use of original objects. Reproductions of paper-based materials, such as letters and photographs, will be used for long-term exhibition in place of originals. Museum objects will not be used in interpretive demonstrations.

Objects may be loaned out to qualified institutions for approved purposes in accordance with *NPS Museum Handbook, Part II, Chapter 5: Outgoing Loans*. No loans are made to individuals. Institutions should submit a Standard Facilities Report for consideration and must meet accepted museum standards for security, handling, and exhibition of NPS museum objects. Sensitive materials may require additional conditions be met prior to a loan commitment. Expenses related to loans of museum objects, including shipping and insurance, will be assumed by the borrower. All exhibits containing museum objects must have proper security, appropriate environmental controls, and proper mounts to ensure the long-term preservation and protection of the objects.

VI. RESTRICTIONS

Restrictions, in addition to those applying to the use of the museum collection outlined in *Section V* of this SOCS, are as follows:

In accordance with *NPS Management Policies* (2006), 7.5.6 *Consultation* and 5.3.5.5 *Museum Collections*, and *Directors Order #24: NPS Museum Collections Management* (2008), curatorial staff should consult with traditionally associated peoples and other cultural and community groups for whom the collection has significance. Archeological objects in the museum collection shall be made available to persons for use in religious rituals or spiritual activities in accordance with *Curation of Federally-owned and Administered Archeological Collections* [36 CFR Part 79, Section 79.10 (c)]. Requests to borrow non-archeological materials for religious ritual or spiritual activities will be addressed on a case-by-case basis. The site will not approve research on human remains and associated funerary objects without the consent of the affected group(s).

In accordance with the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq.), the Archeological Resources Protection Act of 1979, as amended (16 USC 470aa-mm), the National Parks Omnibus Management Act of 1998 (54 USC 100701), and *NPS Management Policies* (2006) 4.1.2. *Natural Resource Information* and 5.2.3 *Confidentiality*, the park may withhold from the public sensitive information concerning: rare, threatened, or endangered species; commercially valuable resources; minerals; paleontological resources; archeological and other cultural resources; objects of cultural patrimony and sensitive ethnographic information; information provided by individuals who wish the information to remain confidential; personally identifiable information; and the identities of individuals who wish to remain anonymous. Inquiries of this nature will be referred to the regional Freedom of Information Act (FOIA) and Privacy Act Officer for consultation and possible review.

In order to comply with NPS policy that prohibits the acquisition of objects with restrictions, the park will use discretion when evaluating potential acquisitions for which there are possible copyright restrictions. Restrictions may be placed on the publication of images or manuscripts in the museum collection if these materials are subject to copyright, and the National Park Service does not hold the copyright.

All endangered, threatened, or rare plants or vertebrate and invertebrate animals will be collected only when accidentally killed or when dead from natural causes. The collection of threatened, endangered, or rare plant and animal species will comply with *NPS Management Policies* (2006), be in accordance with the provisions of the Endangered Species Act of 1973, as amended, and will be strictly limited according to the applicable rules of the U.S. Fish and Wildlife Service.

Final disposition of type specimens will be determined at the Service-wide level and will adhere to recognized conventions established for specific disciplines.

The Park will not knowingly be a partner to or condone the trafficking in illicitly collected materials.

VII. MANAGEMENT ACTIONS

NAMA has identified the following management actions to maintain and improve the BEPA museum collection:

- Review the BEPA Scope of Collection Statement every five years and revise it as needed to remain supportive of and consistent with any changes to the park's mission. Any revision to this document requires the written approval of the Superintendent.
- Use a Collections Advisory Committee to advise and oversee accessions and deaccessions to the BEPA collection, and to assess potential loans, exhibitions, and other uses. Guidance for establishing a Collections Advisory Committee is in the *NPS Museum Handbook, Part II, Chapter 6, Section D* (Director's Order No. 24: Museum Collections Management).
- Ensure that the permanent museum collection is collected, cataloged, and professionally cared for consistently and in a timely manner.
- Identify and review resource management records associated with BEPA and accession appropriate archival materials into the NAMA museum collection.
- Assist the NWP with collections-related projects as needed.