

GUIDE TO NPS REGULATIONS, POLICIES, AND GUIDELINES
AFFECTING COLLECTIONS MANAGEMENT AND CURATORIAL OPERATIONS

PART I: LEGISLATION

The following laws affect NPS museum operations in various ways. The relevant portions of each are briefly outlined.

The NPS Organic Act of 1916 calls on the Service to conserve objects, as well as the natural environment, and to leave them unimpaired for future generations.

The Historic Sites Act of 1935 makes it a national policy to preserve sites, buildings, and objects and gives the Secretary of the Interior responsibility for national leadership in the field of historic preservation.

The Museum Act of 1955 authorizes the Service to acquire collections through donation and purchases, to loan collections, and to exchange collections.

The National Historic Preservation Act of 1966, as amended in 1980, expanded the 1935 Historic Sites Act. The new act declared a national policy of historic preservation. It also included objects in its definition of those resources to be protected by Federal historic preservation programs. The 1980 amendment included the policy that objects and other cultural resources should be managed in a spirit of stewardship. This amendment also incorporated the provisions of E011593 of 1971 relating to protection and enhancement of the cultural environment.

PART II: FEDERAL REGULATIONS

The Code of Federal Regulations includes several parts applicable to NPS management of cultural resources. Among the more relevant ones are the following:

36 CFR 60	36 CFR 68	41 CFR 101
36 CFR 61	36 CFR 800	43 CFR 3
36 CFR 63	40 CFR 1500	

A full description of these CFR parts can be found in Appendix L of NPS-28, the Cultural Resources Management Guidelines. 41 CFR 101 is not mentioned there, however; this CFR part consists of the Federal Property Management Regulations and has some applicability to NPS museum property accountability regulations.

PART III: THE DEPARTMENTAL MANUAL

- Part 145 declares that one of the objectives of the National Park Service is to conserve historical and natural resources.
- Part 400 consists of the Interior Property Management Regulations. This part requires suitable property accountability for all NPS property including, presumably, museum property.
- Part 444 covers the Departmental Physical Security Program. Our own museum security programs are based on these requirements.
- Part 519 provides instructions for fulfilling the policies and directives of EO 11593 and the National Historic Preservation Act.

PART IV: NPS MANAGEMENT POLICIES

Current policies for managing park collections are in Chapter 5 of the NPS Management Policies Book, commonly called The Blue Book. This chapter is entitled "Cultural Resources Management and Preservation". The majority of this chapter deals with historic structures and sites; however, several sections and paragraphs deal directly with objects. Among them are the following from the 1978 edition of the policies as updated through August 1979.

Page 3 includes the definition of "objects".

Page 5 requires an up to date inventory of historic objects, requires special accountability and protection for valuable and highly significant objects, and requires the maintenance of complete accession and catalogue records.

Pages 6-10 discuss research on cultural resources, including the salvage of resources subject to loss or destruction due to park development.

Pages 10-11 cover most of the policies on objects and collections, including archival collections. Among the most important policies on page 10 are those requiring appropriate care, storage, disposition, and display of objects entrusted to the Service and those discouraging the establishment of research archives in parks. The major policies on page 11 are those requiring each park to have a scope of collection statement, those governing how to collect objects, and those governing the documentation and protection of collections.

Pages 13-17 cover the treatment of cultural resources. The most significant policies here are found on pages 14-15; they deal with preservation, restoration, and reconstruction of objects. In this context, preservation includes preventative maintenance, storage, and benign display as well as the provision of proper environmental controls.

Pages 21-22a cover the policies dealing with historic furnishings.

Pages 25-27 cover security measures for cultural properties and include policies on security surveys, physical security, building and fire codes, fire detection and suppression, and humidity and temperature control.

Chapter 7 of the Management Policies is entitled "Use of the Parks". It includes a discussion of the NPS Crime Prevention and Physical Security Program on pages 26 and 27. Structural fire prevention policies also appear here. Museum displays are mentioned specifically as requiring special attention.

PART V: NPS GUIDELINES

Several of the guidelines in the NPS Guideline Series are concerned to some extent with museum objects and curatorial operations. However, two of the Guidelines are directly concerned with these subjects. They are NPS-6, the "Interpretation and Visitor Services Guideline", and NPS-28, the "Cultural Resources Management Guideline".

NPS-6: Interpretation and Visitor Services Guideline"

Pages 1-2 in Chapter 1 contain two statements that I feel are important enough to be quoted directly:

The National Park Service is charged with preserving the natural and cultural resources within the areas under its jurisdiction while at the same time providing for public use and enjoyment.

The impact of public use on park resources can make the achievement of a balance between resource preservation and public enjoyment difficult.

and

Interpretation serves not only to enhance visitor enjoyment, but also to help them recognize and respond constructively to the need to use park resources in ways--and amounts--that assure their preservation.

Pages 1-2 in Chapter 2 make the following points of interest:

The interpretation of park resources never justifies the abuse of those resources.

All interpreters should directly and subtly convey the primary value of park resources and the importance of respecting them.

Interpreters and interpretive methods should not be exempted from the standards of resource care that are required of visitors.

Historic objects should not be viewed or treated as expediently available utensils. They are park resources to which the 1916 National Park Service mandate to preserve for future enjoyment applies.

Our treatment of historic objects must be as much an example of agency mission and philosophy as is our treatment of historic sites and structures. Decisions regarding placement or use of a historic object revolve not around whether we have enough to spare, but what action will best reveal to the public our agency's role as a resource steward.

Many historic objects are singularly fragile. Their longterm value and care must be in accord with professional curatorial and conservation standards.

Probably the single most direct impact of NPS-6 on park museum operations and collections results from guidelines found on pages 14 and 15 in Chapter 7. This section is entitled "Use of Original Historic Objects" and impacts park living history programs most often. This section is too long to cover now in detail. In summary, it permits the interpretive use of original objects so long as they are not subjected to unacceptable possibilities of wear, breakage, theft, or deterioration as a result of their use. When an unacceptable risk exists, an original object must be replaced by a reproduction or the intended use must be changed to reduce or eliminate the risk.

However, NPS-6 goes on to provide a mechanism for requesting an exemption from these requirements when an object is to play a vital role in an interpretive program and it cannot be reproduced. In brief, the park has to prepare a written justification including various required items of information which are identified on pages 14-15. If the Regional Interpreter, the Regional Curator, and the Regional Historian agree that the object can be used, they will so recommend to the Regional Director who can grant approval for its use. A copy of the request and the approval go to WASO afterwards. You should note that final approval of any exemption granted by a Regional Director will be made by the Assistant Director, Cultural Resources Management, WASO. He also can deny approval. When approval is denied at the Regional Office or WASO level, the park cannot use the object and must either obtain a reproduction or modify its program accordingly.

No exemptions will be granted for use of objects in presentations or other activities that may lead to loss or deterioration of historic objects that are directly connected with or are prime survivors from the park's historic periods, events, or personalities.

You should note that requests for exemptions have to be submitted annually when the objects in question are used only seasonally, such as only in a summer program, even if similar requests have been approved in previous years. In addition, any reproductions used in place of historic objects must be clearly and permanently marked as reproductions and are accounted for as capital property or as museum property whichever is most appropriate.

Also in Chapter 7, on pages 15-16, are the Service's standards for curatorial activities. In brief, these standards are:

1. A Scope of Collection Statement is required for each park with a collection or expecting to have one.
2. Museum collections must be utilized in a beneficial but non-consumptive manner.
3. The park interpretive program makes visitors understand and appreciate values of historic objects.
4. All objects in a park collection are accessioned, catalogued, and accounted for in accordance with the MANUAL FOR MUSEUMS or the MUSEUM HANDBOOK.
5. Each object is to be authoritatively identified and authenticated and its authentication is to be documented in the museum records for that object.
6. Each object valued at \$100 or more or that is especially significant is to be inventoried annually and reported to the Regional Office.
7. Regular inspections are to be made to detect deterioration of objects and to plan for needed conservation treatment.
8. Objects are to be exhibited and stored under environmental conditions which will minimize deterioration. Security systems may be needed to protect collections of high value or significance.
9. Films, tapes, books, research data, and other reference materials relating to park resources are properly housed, maintained, and recorded.

NPS-28: Cultural Resources Management Guidelines

The latest edition of NPS-28 is Release 2, dated December 1981 but issued early in 1982. The tone of NPS-28 can best be summed up by quoting from pages 1 and 2 in Chapter 1 which is the Introduction.

The preferred means for perpetuating cultural resources is through protection and preservation maintenance. Minimal intervention is best; if a resource can be preserved by taking no action, that is the ideal way to preserve it.

All cultural resources management activities must be undertaken with the knowledge that the tangible resources being treated are both finite in number and nonrenewable if damaged or allowed to deteriorate.

This section continues by listing the core cultural resources management mission of the National Park Service and concludes by saying:

In sum, to preserve what we have and to present it with integrity and candor is considered the best and highest application of available funds and professional expertise.

Also in Chapter 1 are found definitions for a large number of terms found in NPS-28 and in most cultural resources management plans and other documents. Among those terms of most interest to us are the following:

archives	historic document
artifact	library
conservation of objects	museum collection
cultural resources	object
cultural resources management	protection
cultural resources specialist	reconstruction of objects
cultural resources technician	restoration
curator	routine preservation maintenance
ecofact	

Chapter 2, pages 1-2 give the general standards for internal service activities impacting cultural resources.

Chapter 2, pages 2-3 give the standards for protecting cultural resources. One of them specifically calls for safeguarding the physical condition of objects.

Chapter 2, pages 9-10 give the standards for historic furnishings. These standards indicate the circumstances under which re-furnishings may be undertaken and the quality controls which must be followed.

Chapter 2, pages 10-11 give the standards for managing museum objects. For the most part, these standards are the same as those cited in NPS-6 on pages 15-16 in Chapter 7. The additional standards include the following:

A collection preservation guide is required for each park having a collection.

Preparation and curation of archeological materials are to be planned for and carried out as integral parts of all archeological field projects and funded accordingly. Field records, notes, photographs, and other data are to be made part of the accession records for those projects.

Accessions of archeological materials are not to be broken up but kept at the same repository except as otherwise deemed necessary for purposes of exhibition, research, or security.

Objects determined to be outside the scope of the park's collection or otherwise surplus to the collection are to be deaccessioned according to the procedures outlined in the NPS MUSEUM HANDBOOK.

Page 12 in Chapter 2 provides a place for standards for library and archival materials. Unfortunately, such standards have not yet been developed. It is to be hoped that they will appear in Release 3 in the near future.

Chapter 2, pages 19-21 introduce the subject of standards for personal conduct, a subject not well covered in Release 1. Briefly, this section refers the reader to the Department of Interior's "Regulations for Employee Responsibility and Conduct" and to codes of ethics and standards of conduct adopted by various professional organizations to which NPS cultural resources management personnel may belong. Employees are expected to adhere to these standards, particularly if they are members of such organizations. This section continues by spelling out specific standards for dealing in antiques, giving appraisals of historic objects, using collections for personal reasons, and field study and collecting for personal gain.

Chapter 3, page 4 discusses the National Catalog of Museum Objects which was established at the Harpers Ferry Center five years ago.

Chapter 3, page 12 describes collection preservation guides in terms of why and how they are prepared and how they are to be used.

Chapter 3, page 18 describes historic furnishings reports in similar terms. You should note that this report combines in one document the documents formerly known as furnishings studies and furnishings plans.

Chapter 4, pages 5-10 is one of the most important parts of NPS-28 for museum operations. This section is entitled "Management of Objects and Documents". It states the principle that one of our goals is "to preserve intact as much of the fabric as is possible and to minimize alteration and deterioration" when dealing with historic objects and documents. This section makes one important point not previously enunciated in any NPS document: that natural history specimens collected for their decorative values and intended for use as cultural objects--such as a moose head over a fireplace--are considered to be cultural resources, whereas those collected for their scientific values are not considered cultural resources, even though they may be part of a park museum collection.

This section also refines for the first time the role of archival materials in a park collection, defining the difference among archival collections, personal papers collections, and artificial collections of papers and spelling out guidelines for using both original and non-original materials.

This section concludes with a lengthy discussion of how to obtain conservation treatment for both objects and documents. All NPS employees working with park collections should become intimately familiar with this entire section as soon as possible.

Chapter 5, pages 1-3 provides guidelines for park-based management activities that affect cultural resources, including programming and budgeting for cultural resources treatment and performing cultural resources preservation maintenance.

Chapter 5, pages 3-8 give the guidelines for protection in historic and prehistoric sites and structures, including both security and fire safety. This section is based on the principle that the activities carried out within a site or structure may have to be changed if they would present protection or safety problems that might create an unacceptable risk to the resource or conflict with its historic integrity or historical veracity.

This section also defines the eight most commonly used protective systems for protection of historic structures and museum collections and describes how to determine when any of these systems are needed.

Chapter 5, pages 8-9 are the guidelines for conducting park interpretive programs. The emphasis in this section is cooperation among interpreters and cultural resources management specialists in the conduct of park planning and programs.

Chapter 5, pages 15-17 are the guidelines for energy conservation in historic structures and those structures housing museum collections. These guidelines require that park energy conservation programs consider the special environmental requirements of cultural resources as well as requiring that optimum environmental conditions be provided whenever feasible and economically possible.

Chapter 7 describes how to amend NPS-28. It provides a form letter that any user of NPS-28 can complete with his suggestions for changes and improvements. Suggestions from field users are considered each time NPS-28 comes up for review every three years. The form letter can be locally reproduced in as many copies as may be needed.

Appendix D tells how to prepare a Collection Preservation Guide.

Appendix G tells how to prepare a Historic Furnishings Report.

Appendix O reproduces the Code of Ethics and Standards of Conduct of the American Institute for Conservation of Historic and Artistic Works. All conservation work performed on NPS artifacts must be done in accordance with these standards, whether performed in-house or under contract.

Appendix R reproduces an Object Treatment Request or Form 10-252 which is used to obtain conservation treatment from the Harpers Ferry Center for objects in park museum collections.