The Archaeological Curation Crisis: An Integrated Action Plan for the SAA and Its Partners

Submitted by the SAA Advisory Committee on Curation
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Background

Archaeological collections, associated records, and resulting reports from state and federally-sponsored compliance projects are permanent national legacies and tangible testimonies to the rich prehistory and history of this country. They are also the majority of the collections that have been recovered over the last 30 years, although research-derived collections are numerous and important. The National Historic Preservation Act, Archaeological Resources Protection Act, Antiquities Act, and other statutes provide strong legal support for the care, preservation, and use of archaeological collections, while the "Curation of Federally-Owned and Administered Archeological Collections" (36 CFR 79) regulations set forth appropriate standards and guidelines.

The long-term care and management of archaeological collections, records, and reports have largely been neglected. Many are in a critical state; their accessibility for education and research and their long-term preservation are endangered. Many U.S. repositories that care for archaeological collections are crowded, understaffed, and underfunded. Many cannot adequately care for federal collections at the standards required by law and regulation.

The future of archaeological collections care in the U.S. is in jeopardy and requires action by professional organizations such as the SAA. A practical and financially responsible curation program should be fashioned that recognizes the long-term care of both existing and future collections generated by both compliance and research projects. At the crux of any action plan, however, must be a foundation of information upon which to make decisions. We know little about the range of collections that currently exist nationwide and the qualifications of the repositories that care for our collections.

We believe that archaeologists must become fully responsible for the collections and records they generate. Therefore, the culture of archaeology must change to heighten the value of collections within the discipline, following professional ethics. Partnerships with other constituencies, particularly museums, will be essential. All of this requires education and advocacy by the SAA and its partners.

In 1993, the SAA Task Force on Curation made some recommendations that were similar to those presented here. Ten years later, we can delay no longer. If the curation crisis continues to affect the compliance and development process, such as the lack of repository space is doing in Colorado, it is entirely possible that Congress or the Executive branch will take steps to revise some key historic preservation laws and regulations.

A Summary of Needed Actions

We ask that the SAA and appropriate partners take an active role in the following arenas related to the archaeological curation crisis. Short-term and long-term actions are listed in priority order. Further details on each action are provided below.

Short-term Actions
1. Develop a repository survey instrument to inventory and document existing collections nationwide.
2. Advocate for the drafting and promulgation of the deaccessioning regulation.
3. Advocate that granting organizations require accountability and care of the research collections that are created.
4. Advocate that the NSF reinstate its systematic collections grant program. (See Long-term Goal # 1)

5. Advocate for undergraduate and graduate-level training on archaeological curation. Create an annual award for collections-based research.
6. Advocate for the maintenance of the National Archeological Database-Reports module.

Long-term Actions
1. Submit a grant proposal to implement the collections survey to NSF and/or NEH.
2. Work with Congress to fund a) an archaeological curation grants program and b) a National Archaeological Curation Program infrastructure.
3. Partner with the AAM and others to scope out an accreditation program for repositories that curate archaeological collections.
4. Develop standards for: a) field collection; b) associated records and their management; and c) access and use of archaeological collections.

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Actions Items toward a National Archaeological Curation Program

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SHORT-TERM ACTIONS
I. Growth Management—Given the continuous growth of archaeological collections in the current environment of crowded repositories with inadequate funding and staff, it is critical that the profession manages its own collections and documents the scale of the problems that exist. Management requires baseline information. A national inventory of what collections currently exist, along with their size, condition, and ownership, must be compiled and maintained. This inventory will provide a critical foundation upon which to develop strategies and policies on many issues, including deaccessioning, repository accreditation, field collection, and sampling.
Action strategy: The Committee recommends a short-term and long-term action. 1) The SAA, in partnership with the Society for Historic Archaeology (SHA), American Anthropological Association (AAA), Archaeological Institute of America (AIA), and Advisory Council for Historic Preservation (ACHP), develops such a survey instrument. Federal and state agencies should be involved. The Heritage Health Index study currently conducted by Heritage Preservation and the collection evaluation instrument used by the U.S. Army Corps of Engineers' Mandatory Center of Expertise for the Curation and Management of Archaeological Collections (MCX-CMAC) should be consulted. 2) A grant proposal for the implementation of the survey should be written and submitted to the National Science Foundation (NSF) and the National Endowment for the Humanities (NEH), possibly as a joint grant. The national data must be compiled, maintained, and made accessible to the profession by one managing organization.

II. Deaccessioning—As the curation crisis worsens and space to curate collections is further limited, repository curators are desperate to deaccession highly redundant materials, among others, to regain space. A flexible set of national standards should be developed that address the disposal of archaeological materials and set implementing guidelines for all federal agencies.
Action strategy: The Committee recommends that the SAA and SHA encourage the Archeology and Ethnography Program, National Park Service, to redraft the deaccessioning regulation in 36 CFR 79. It was drafted in 1990, but never promulgated due to considerable controversy. It is time to start again.

III. Accountability of Research Project Collections Funded by Grants—Archaeological research projects are primarily funded by federal agencies, such as the NSF and the NEH, and non-profit granting organizations, such as Wenner-Gren. Although archaeologists receive sizeable grants through these programs, currently no attention is paid to what happens to the resulting project collection and associated records. These are the permanent legacies of the grant project, which require long-term care and accessibility for future research, interpretation, and heritage activities. Basic accountability of research collections could be achieved if:
- All grant applicants are required to identify the repository that will curate the collection and provide a signed curation agreement in the grant proposal.

- All grant applicants are required to include a budget line item for curation, including the preparatory costs for proper storage materials (e.g., bags, boxes, labels), conservation, and repository fees. The grant program then accepts the additional costs of curation.
- The grant program provides data on where all collections are curated from granted projects.

Action strategy: The Committee recommends that the SAA, in partnership with the SHA, AAA, and the AIA, strongly advocate for these changes in granting procedures by key granting agencies and organizations. It should be emphasized that the products, e.g., collections, of publicly funded projects must be accounted for and these collections must be available for future use.

IV. Undergraduate and Graduate-Level Training on Collections Management—Some aspects of the curation crisis have occurred because practicing archaeologists have received little to no education about their responsibilities to the collections they create. Few have learned about researching collections, how or why to budget for curation, how to work with a repository to prepare a collection for curation, how to manage associated documents, or why there is a curation crisis. This cannot continue.

Action strategy: The Committee recommends that the SAA, in partnership with the SHA, AAA, and AIA, take a strong advocacy position that: 1) Archaeological curation becomes a mandatory course at the graduate level and is introduced to undergraduates. 2) Collection-based theses and dissertations are promoted, not discouraged. 3) An award program is developed on collections-based research.

V. Archaeological Gray Literature--The results of most archaeological compliance work are written in reports that are not published or cataloged in libraries. They become gray literature. The National Archeological Database Reports (NADB-R) module is the only publicly-accessible, nationwide database that provides bibliographical references of these reports. This database should be updated annually. Effort also should be made to provide approved compliance reports on the Internet.

Action strategy: The Committee recommends that the SAA and SHA are strong advocates for NADB-R and make recommendations to the Archeology and Ethnography Program, NPS, and the National Council of State Historic Preservation Offices on any needed improvements to the current system.

LONG-TERM ACTIONS
I. Federal Support for Archaeological Collections and the Repositories That House Them—It is estimated that approximately 65-70% of all collections under federal stewardship are archaeological (see Appendix I for information on Dept. of Interior bureaus). This is also probably true for state and tribal collections. The long-term care of these collections often does not meet the standards in 36 CFR 79 and many need rehabilitation and rehousing. Also, many repositories do not have basic inventory information about the collections they manage, their physical plant does not meet the standards, and many are running out of space to house collections. A grant program is needed to help fund:
- the upgrade of repositories that hold federal and non-federal archaeological collections to meet the standards in 36 CFR Part 79;
- a basic inventory and assessment of all archaeological collections cared for by a repository; and,
- rehabilitation of existing federal and non-federal collections, including rehousing and conservation.

Action strategy: The Committee recommends a long-term and a short-term action: 1) Develop a strong advocacy position on the need for such a grant program to benefit repositories in all states. This should be done in partnership with the SHA, AAA, ACHP, and AIA. The SAA should work with suitable Congressional staffers to develop and fund a program that distributes a minimum of $5 million per year. The American Association of Museums (AAM), the Institute of Museum Library Services (IMLS), and the National NAGPRA Program have robust grants programs, which may serve as models. 2) In the short-term, take a strong advocacy position on the need for the NSF to reestablish its systematic collection grant program that once provided much needed funding for the upgrade of non-government-related archaeological collections.

II. Accreditation of Repositories Holding Archaeological Collections—Currently, it is nearly impossible to know definitively if a repository meets the standards in 36 CFR 79 and if the curation fees it might charge are appropriate. A flexible accreditation program is needed to identify repositories that meet 36 CFR 79 and ensure the best long-term care for the archaeological collections created, minimally, on state and federal lands. A national accreditation program should include:

A. Development of uniform criteria by which repositories can comply with 36 CFR 79, such as:
   1. adequate security, environmental controls, collection housing, and housekeeping;
   2. mission statement, scope of collections, and standard collections management policies;
   3. periodic inventories and inspections; and,
   4. appropriate access to the collections for research, education, and heritage activities.
B. Trained personnel to implement the accreditation program and conduct periodic inspections.
C. Maintenance of a list of accredited repositories and their associated credentials for use by federal, state, tribal, and local agencies in need of professional collections management.

Action strategy: The Committee recommends that the SAA scope out this important program and consult with the AAM about their Accreditation Program as a potentially viable model. Archaeologists who are currently involved with the AAM program should be consulted. Also, consideration should be given to the standards for archaeological repository evaluations developed by the Army Corps' MCX-CMAC. Contact should also be made with the Department of Interior (DOI), the Congressionally-designated lead agency on historic preservation, which promulgated 36 CFR Part 79, about developing such a program.

III. Standards and Guidelines— Archaeologists need flexible standards and guidelines to better perform their research and compliance work and to prepare the resulting products for future use. These should focus on:

- Field Collection Practices—Field collection policies, including "no collection" policies, are now being developed haphazardly by federal and state agencies to minimize the creation of artifact collections. This practice has huge implications for the future quality and usability of the collections cared for in the public and professional interest. Standards are needed to help determine the kinds and types of artifacts to be collected during survey, site testing, and excavation. Guidance is also needed on developing statistically valid sampling strategies and documenting all decision-making.
- Associated Records and Their Management—Many archaeologists do not know how to properly manage and care for the associated records and documentation resulting from a compliance or research project, particularly the growing electronic record.
- Access and Use of Archaeological Collections and Associated Records—Both archaeologists and repositories are bound by professional ethics to ensure that collections are known, accessible, and can be used. Key responsibilities need to be articulated in standards and guidelines.

Action strategy: The Committee recommends that the SAA and SHA, at a minimum, form teams of members to draft standards and guidelines for these three topics. *Best Practices for Archaeological Collections Management*, piloted by the SHA and sponsored by the National Center for Preservation Technology and Training, should be consulted. Other professional organizations, such as the Society of American Archivists, should be consulted when appropriate. Also, it should be noted that the SAA Curation Committee continues to work on developing a workshop on electronic access to collections.

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Implementation of a National Archaeological Curation Program

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Successful development and implementation of several action items presented above can be achieved under a National Archaeological Curation Program, a two-tiered infrastructure that will require support from Congress. The two tiers are:
1. Addition of an archaeological curation component to each State Historic Preservation Office (SHPO).
2. Establishment of an Office of Archaeological Curation in the Department of the Interior.

At the state level, the SHPO program is the anchor to the national CRM program. Archaeologists and cultural resource managers across the country have well-established relations with their SHPO. The

addition of a curation position, if adequately funded, will not overly tax existing review and compliance personnel. The position description should include such duties as:

- repository accreditation;
- helping with the curation grant program;
- maintaining critical, statewide information about the current status of collections;
- being the primary source of information on curation standards for cultural resource managers;
- assuring that no archaeological projects are permitted without a curation plan and budget.

The costs of this tier will be approximately $10 million per year or approximately $200,000 per state. This does not include the grant program, which the Committee recommends to be $5 million per year.

At the national level, it is critical that an Office of Archaeological Curation is created to provide management oversight of a National Archaeological Curation Program. The Secretary of the Interior has primary oversight over compliance with key historic preservation laws. It is recommended that existing federal infrastructure is used, such as the DOI's Office of Acquisition and Property Management that currently oversees museum property management or the office of the Departmental Consulting Archeologist in the National Park Service. The primary duties of this office would be to:

- establish and oversee a repository accreditation program;
- establish and oversee a curation grant program;
- promulgate appropriate regulations, such as the deaccessioning regulation in 36 CFR79;
- maintain the National Archeological Database;
- develop other curation-related standards and best practices in partnership with the professional archaeology, museum, and conservation organizations;
- provide expert guidance on building appropriate repositories in partnership with states, tribes, and other organizations;
- provide appropriate training on archaeological collections management and curation.

The costs of this office are approximately $1.5 million per year, which includes six staff and an adequate budget for travel and information management. This does not include the grant program, which the Committee recommends to be $5 million per year.

APPENDIX I

U.S. Department of the Interior Museum Property
Total Collections Held in both Bureau Facilities and in Other Institutions – FY 2002

Bureau + Other Institutions	BIA	BLM*	BOR	FWS	NPS	IACB	Discipline Totals
Archeology	4,389,996	20,057,718	6,847,056 + 2,086 cu.ft.	1,912,651 + 1,171 boxes	31,060,144	0	64,267,576 +2,086 cu.ft. +1,171 boxes
Art	7,684	44	299	978	Included in History	2,882	12,388
Ethnography	Included In Art	2,273	11	11,055	27,808	8,168	51,420
History	4,750 + 20 box	51,713	4,006	215,103	3,289,694	0	3,566,630
Documents as # of items	654,006	76,800 +18 lots	3,100,771	1,645,948	60,028,799	0	65,506,485
Documents as # of linear feet	409 ln.ft.	48 ln.ft.	1,938 ln.ft.	1,029 ln.ft.	37,518 ln.ft.	0	40,942 ln.ft.
Paleontology	249	3,393,773	51,366	501,368	210,578	0	4,157,342
Geology	1	1,981	424	0	63,215	0	65,917
Environ. Samples	0	9,742	0	202	0	0	9,944
Rounded Total #s used in Summary	5,057,000	23,842,000	10,004,000	4,488,000	96,181,000	11,000	140,000,000

*Departmental offices are working with BLM to collect revised data from all BLM field units and non-federal institutions holding BLM collections.

FY2001 Resources Used for Interior Bureau Museum Programs					
Bureau/ Office	Funds Expended	FTE Allocated	Estimated Total Collection Size*	Objects per FTE	$ per object
NPS	$22,569,930	727.0	90,258,526	124,152	$0.25
BLM	500,000	5.0	23,842,451	4,768,490	0.02
BOR	1,309,033	9.4	9,390,749	999,016	0.14
FWS	890,000	6.7	4,713,252	703,470	0.19
BIA	487,000	4.0	3,983,481	995,870	0.12
USGS	267,000	3.0	39,527	13,176	6.75
IACB	508,856	10.0	11,184	1,118	45.50
NBC	**960,600	6.0	3,982	664	241.23
MMS	10,000	<1	54	<54	185.18
OTFM	900	<1	19	<19	47.37
Totals	$27,503,319	770.3	132,246,225	171,748	$0.21

*Collection sizes reflect the most current data available – FY2001 data for all bureaus except NPS (FY2000 data) and BLM (FY1993 data).
**Funds expended by NBC include Departmentwide training and technical assistance in addition to collections management and public program activities.