DOI Museum Property Directives

Title: Inventory of Museum Collections
Directive Number: 21
Originating Office: Office of Acquisition and Property Management, Department of the Interior (DOI)
Approved By: Debra E. Sonderman
Official Title: Director, Office of Acquisition and Property Management
Effective Date: MAR 13 2014
Expiration Date: This Directive will remain in effect until superseded.

1.1 Purpose. To establish policy and procedures for inventorying, reconciling, and certifying DOI museum property (museum collections) in bureau and non-bureau facilities.

1.2 Scope. This policy applies to all bureaus and offices responsible for managing museum collections, a subset of personal property.

1.3 Definitions. See Section 1.17 of this DOI Museum Property Directive (Directive).

1.4 Responsibilities.

A. The Director, Office of Acquisition and Property Management and the Museum Property Executive Program Committee are responsible for:

(1) Establishing policy for the inventory process for DOI museum collections consistent with Departmental Manual (DM), Part 410, *Personal Property Management* (410 DM), and Interior Property Management Directives (IPMD) Section 114-60.3, *Property Inventories*.

(2) Providing DOI-wide training on conducting, reconciling, and certifying the inventory of DOI museum collections.

B. The bureau/office Property Management Officer (PMO) and/or National/Chief Curator, as identified in bureau/office policy, administers, coordinates, and manages the inventory program and process for museum collections.

C. The Accountable Property Officer (APO) has overall responsibility for a specified group of personal property items. An APO ensures the establishment and maintenance of accountability records to provide overall management of personal property. An APO designates Custodial Property Officers and Inventory Data Collectors in writing.

D. The Custodial Property Officer (CPO) is responsible for the daily management and oversight of assigned personal property.

E. Curatorial and/or museum property management staff is responsible for conducting inventory procedures appropriate to museum collections as presented in this Directive. Such staff may also be designated as CPO.

F. Inventory Data Collectors (IDC) or inventory counters are responsible for conducting an inventory of museum collections. Every effort should be made to have at least two IDCs conduct an inventory and, to the extent possible, there should not be a supervisor/subordinate relationship between them.

1.5 Inventorying DOI Museum Collections. An inventory is the process of physically locating all, or a random sample of, museum objects and verifying information in the related catalog or accession records. The process of inventorying museum collections must be consistent with 410 DM and IPMD 114-60.3.

A. Museum collections are inventoried on a regular basis to verify the physical location and condition of objects and the accuracy of the catalog record; to reveal potential loss or theft; to assist in decision making about collections use, growth, storage, and security; and to maintain accountability.

B. Inventories are accomplished at the unit level or by facility according to bureau/office policy. Each bureau/office must ensure that all objects have an equal chance of being selected for inventory in a given inventory cycle. Appropriate staff, such as the APO, CPO, IDCs, and non-bureau facility staff, must carry out the following steps in the inventory process for a unit's museum collections housed in bureau and non-bureau facilities:

(1) Determining the appropriate method(s) to establish the inventory sample size (see Section 1.8 of this Directive).

(2) Determining the appropriate inventory method(s) (see Section 1.9 of this Directive).

(3) Completing scheduled inventories.

(4) Investigating and reconciling promptly all discrepancies found during an inventory.

(5) Reporting on the inventories conducted, including inventory certification.

C. Use of the Interior Collection Management System (ICMS) during Inventory. The Automated Inventory Program (AIP), a component of ICMS, supports the inventory process by enabling authorized users to generate electronic and

hardcopy inventory lists of objects. The AIP includes data fields to enter and save both numerical and narrative inventory information in ICMS.

1.6 Types of Museum Objects for Inventory. The following types of objects must be inventoried using the frequencies provided in Section 1.7, sample sizes in Section 1.8, and inventory methods in Section 1.9 of this Directive:

A. Objects that are controlled property. These are objects that are especially sensitive; have high intrinsic or scientific value; are especially vulnerable to theft, loss, or damage; are valued at or above a threshold amount established by each bureau/office; are a museum firearm; or are a short-term, incoming loan (for inventory purposes only). With the exception of museum firearms, which are always controlled property, bureaus/offices must develop standards for specifying which objects are controlled property and must document this status in the related catalog records.

B. Cataloged objects. These are objects that are not controlled property and have a corresponding catalog record. Objects must be cataloged in order to be properly inventoried. Archives included on an inventory list must be inventoried at the level at which they were cataloged.

C. Accessioned objects that are not cataloged. Accessioned objects must be inventoried even if they have not been cataloged. Bureaus/offices may account for accessioned objects that are not cataloged by container, such as a box of objects or archives, rather than by individual object.

1.7 Inventory Frequencies. The inventory frequency for museum collections varies by the type of object described in Section 1.6 of this Directive. The inventory frequencies for objects housed in bureau and non-bureau facilities are:

A. Objects that are controlled property must be inventoried on an annual basis.

B. Cataloged objects must be inventoried every two years, at a minimum. Bureau/office policy may require this inventory to be conducted more frequently.

C. Accessioned objects that are not cataloged must be inventoried every two years, at a minimum. Bureau/office policy may require this inventory to be conducted more frequently.

1.8 Methods to Determine the Inventory Sample Size. The following are to be used to determine the number and type of objects to be inventoried:

A. One Hundred Percent (100%). All or 100% of the objects in the museum collection are identified to be inventoried using the inventory method(s) provided in Section 1.9 of this Directive. A 100% sample size must be used for controlled property and may be used under other circumstances (see Section 1.14 of this

Directive). ICMS may be used to generate this list.

B. Statistical Random Sampling (SRS). SRS is a statistically reliable method to capture the characteristics of an entire museum collection while providing a manageable number of objects to inventory. This method must *not* be applied to controlled property. To use this method, the APO, CPO, IDCs and/or non-bureau facility staff must:

(1) Determine the number of objects to be inventoried. To ensure statistical validity, the chart in Appendix 1 of this Directive must be used to determine the random sample size based on the total collection size.

(2) Create the list of randomly generated objects to inventory. The AIP in ICMS may be used to generate this list.

1.9 Inventory Methods. The following methods are to be used to conduct an inventory. More than one method may be used for objects on an inventory list that are *not* controlled property. When an inventory method is applied to objects that are accessioned but not cataloged, the inventory may be conducted by individual object or by container.

A. Physical inspection. This method involves physically inspecting the object and must be applied to all controlled property. To conduct this method, the APO, CPO, IDCs, and/or non-bureau facility staff must:

(1) Confirm that each object on the inventory list is in the location noted on the catalog record.

(2) Physically inspect each object, verify the data required in Section 1.10 of this Directive, and update the catalog or accession record as needed.

(3) Document any missing objects and begin an investigation as soon as possible. See Section 1.12 of this Directive.

(4) Certify that the inventory was completed.

B. Transaction-based inventory (TBI). An object is considered to be inventoried and does not need to be physically inspected if documentation exists of curatorial or museum property management staff performing a transaction that involved physical inspection during the inventory cycle period. Types of records that document a transaction include, but are not limited to: catalog records that meet the data requirements in Directive 3, *Required Standards for Documenting Museum Property*; loan records; or conservation records. Each record type must include the data required in Section 1.10 of this Directive. This method must *not* be applied to objects that are controlled property. To conduct this method, the APO, CPO, IDCs, and/or non-bureau facility staff must:

(1) Confirm that an appropriate transaction record exists for each object being inventoried using this method.

(2) Certify that the inventory was completed.

1.10 Mandatory Inventory Data. The following mandatory data, as outlined in Directive 3 and IPMD 114-60.3, must be completed and verified during an inventory. The accession or catalog record must be updated, as needed.

A. Object(s) found. An object's presence is verified by comparing the catalog number on the catalog record (or accession number when inventorying accessioned but not cataloged objects) with the number on the object or its associated tag or label. If the object is missing, the procedures in Paragraph 1.12A of this Directive must be followed.

B. Item count. The number of objects indicated in the accession or catalog record is verified by comparing it with the physical count. For archives, the volume recorded in the catalog record by number of boxes, linear feet, cubic feet, or file unit must be verified.

C. Location. The location of the object as recorded in the catalog or accession record is verified by comparing it with the actual physical location. The location recorded for some natural history specimens that are stored by phylogenetic information may be less specific because the location within a cabinet or shelving unit is based on the specimen's position in the taxonomic system.

D. Condition. The physical state of the object is examined to determine if the condition of the object has changed when compared to the information in the catalog or accession record.

E. Date of Inventory. The date the object was inventoried is recorded. This is required when the capability to record it is available in ICMS.

F. Inventory Method. The inventory method selected for each object from Section 1.9 of this Directive is recorded. This is required when the capability to record it is available in ICMS.

1.11 Inventorying Outgoing Loans. The following actions must be taken when museum objects in an outgoing loan are on the inventory list:

A. Bureau/office objects on loan to another DOI unit must be inventoried by the appropriate staff of the borrowing unit.

B. Bureau/office objects on loan to a non-bureau facility must be verified. Bureau/office policy must address how such verification is accomplished,

particularly when a loan agreement does not include conducting periodic inventory. See also Section 1.16 of this Directive.

C. The data required in Section 1.10 of this Directive must be verified when an outgoing loan is renewed.

1.12 Inventory Reconciliation.

A. Missing museum object(s). If an object is determined to be missing during an inventory, the following procedures must be followed by curatorial staff, museum property management staff, and/or IDCs:

1. The pertinent catalog, accession, and inventory records, along with photographs if available, must be obtained for use during the investigation.

2. Storage, exhibit, and other areas where objects might be located must be thoroughly searched.

3. If the missing object is located, its catalog record must be updated consistent with Section 1.10 of this Directive. No further action is required.

4. If the missing object cannot be located and it is *not* controlled property, the missing object must be documented as described in Paragraphs 6-8 of this Section, the APO and CPO must be notified, and professional judgment used to determine whether to notify law enforcement concerning the possibility of theft.

5. If the missing object cannot be located and it is controlled property, the following steps must be taken:

a) Notify the APO and CPO, and contact law enforcement as soon as possible.

b) Document the missing object as described in Paragraphs 6-8 of this Section.

c) Provide copies of the catalog, accession, and inventory records and available photographs to the investigating law enforcement officer.

d) Include a copy of the law enforcement report and other documents relating to the missing object and investigation with the accession and/or catalog information for the missing object.

e) Request that the law enforcement officer contact the Federal Bureau of Investigation to add the object to the National Stolen Art

File (NSAF), if the missing object meets the criteria for NSAF listing (see Appendix 2 for additional information).

6. The status of the object must be recorded as "missing" in the catalog record.

7. Within 30 days of determining that an object cannot be located, a Report of Survey (DI-103) must be completed and submitted for action by a Board of Survey. The Board of Survey is required to make a determination about the missing object and possible financial liability (see IPMD 114-60.3 and 114-60.800).

8. All missing objects must be identified as such on the inventory list. All missing objects, regardless of value, must be reported each fiscal year in the bureau/office's Museum Property Management Summary Report and other collection management reports as required by bureau/office policy.

9. If the inventory shows that any controlled property or a substantial number of objects that are not controlled property (above a five percent error rate) are missing during an inventory, the PMO or other designated authority may require the unit to complete a special inventory (see Section 1.14 of this Directive). Additionally, a request to investigate the situation may be made to the Department of the Interior's Office of Inspector General.

B. Item discovered during inventory. If an item is discovered during inventory that was not previously documented in the museum records, curatorial or museum property management staff must determine if it is to be included in the unit's museum collection and then follow appropriate DOI accessioning or disposition procedures.

C. Reconciliation of an inventory.

1. Any discrepancies found during an inventory must be investigated and resolved to the extent possible.

2. Reconciliation of an inventory list with the appropriate museum records, including adjustments and a DI-103, must be completed by the end of the fiscal year in which the inventory was conducted.

1.13 Inventory Reports and Certification. Bureaus/offices must establish specific procedures for reporting on the inventories conducted, including certification of the inventory.

A. All units must generate a report for the inventories conducted on museum collections. Reports are available in the AIP in ICMS.

B. The APO must certify the scheduled inventory and submit the certification to the appropriate bureau/office property manager designated in bureau/office policy, such as the PMO or the National/Chief Curator.

1.14 Other Inventories. Special inventories may be necessary under the following circumstances:

A. Change of Designation of Accountability for Museum Collections. When a new or interim APO or CPO is designated, the following options are available:

1. If an inventory has occurred within the previous inventory cycle, the incoming APO or CPO signs a statement of responsibility for the museum collections under his or her jurisdiction; or

2. If the incoming APO or CPO does not sign a statement of responsibility, an inventory must be conducted. The appropriate method to determine the inventory sample size must be selected from Section 1.8 and the appropriate inventory method(s) must be selected from Section 1.9 of this Directive.

B. Result of Inventory Deficiencies. When a Report of Survey or other circumstance reveals that a number of museum objects are unaccounted for or a significant loss has occurred, a special inventory may be conducted.

C. Audits or other situations, such as an investigation by the Department of the Interior's Office of Inspector General.

1.15 Inventory Documents Retention. All documentation used in the inventory process must be retained until the third succeeding inventory in accordance with IPMD 114-60.3 and bureau/office policy. If discrepancies are identified in the inventory, then all inventory documentation must be retained until the discrepancies are resolved.

1.16 Conducting Inventories at Non-Bureau Facilities.

A. An agreement or similar instrument entered into, or renewed, between a bureau/office unit and a non-bureau facility must address inventory completion according to the requirements of this Directive and bureau/office policy.

B. Bureaus/offices should share the physical inventory process when two or more units within a bureau/office have museum collections in the same facility or when two or more bureaus/offices have museum collections in the same facility.

1.17 Definitions. Many of the following definitions are from 411 DM and therefore refer to museum property. Museum property and museum collections are synonymous in these definitions. Also, some definitions are from or closely align to definitions in IPMD Section 114-60.1, *Personal Property Administration.*

Accountable Property Officer (APO) – A DOI employee assigned overall responsibility for a specified group of personal property items, including museum collections, and for ensuring the establishment and maintenance of accountability records to provide effective overall control over that property. Formerly known as "Accountable Officer."

Board of Survey – A standing or ad hoc committee appointed by the APO that is responsible for reviewing reports of lost or stolen property and investigating the circumstances surrounding the incident to determine if there is any evidence of negligence, willful misconduct, or deliberate unauthorized use or disposition of the property.

Catalog record – Written or electronic documentation that captures the unique identifying number assigned to a museum object or group of objects, along with a physical description, condition, provenience, and other pertinent information that facilitates physical and intellectual access.

Controlled property – For museum collections, the term includes an object or group of objects that is especially sensitive; has high intrinsic or scientific value; is especially vulnerable to theft, loss, or damage; is valued at or above a threshold value established by each bureau/office; is a museum firearm; or is a short-term, incoming loan (for inventory purposes only). The catalog record must indicate whether an object has been designated controlled property. Examples of objects that have been designated controlled property are objects on public exhibit, type specimens, and artwork with a high appraisal value.

Custodial Property Officer (CPO) – A DOI employee who is responsible for the daily control and supervision of personal property assigned to him or her. Formerly known as "Custodial Officer."

File unit (For archives only) – The basic means by which individual archival documents are physically consolidated and arranged; or a grouping of related documents. There is no limit to the size of a file unit, which may consist of more than one file folder.

Inventory – 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.

Inventory Data Collector (IDC) – An individual who conducts a scheduled inventory by locating and identifying the objects on the inventory list, recording and updating the required information about the objects, and, as needed, assisting in reconciling the inventory. Whenever possible, an IDC is a disinterested person who does not have direct responsibility for the museum collections being inventoried. Also known as an "inventory counter" (see IPMD 114-60.3).

Loan – The temporary transfer of custody of museum property 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 loans are documented in loan agreements or similar instruments.

Lot – Two or more objects of a similar type that are collected at the same locale, at a single point in time, and are cataloged as a group under a single catalog number.

Museum collection/Museum property – A subset of personal property, including objects, works of art, and/or archives, that is retained for long-term preservation, study, and interpretation consistent with statutory requirements, its relationship to the mission of the respective bureau/office, or other appropriate factors. A museum collection / museum property is acquired according to a rational plan, such as a Scope of Collection Statement. It consists of all accessioned, unaccessioned, cataloged, and/or uncataloged objects; and all museum objects under the control of a facility, unit, or bureau/office. Museum property is synonymous with and referred to as "museum collection(s)" in the DOI Museum Property Directives, as a standardized term that is used by museum professionals.

Museum firearm – A rifle, pistol, or any other weapon designed to expel a projectile by the action of an explosive, which is of historic value, is acquired for exhibit, research, or interpretation, and is accessioned into a museum collection. Inoperable firearm components, such as those recovered from an archeological project or any other historic firearm parts that are incapable of being used to expel a projectile on their own, are not museum firearms.

Object – A physical item of museum property. It includes art and history objects, archeological artifacts, ethnographic objects, archival items, and natural history specimens.

Property Management Officer – A DOI employee responsible for the overall administration, coordination, and control of the personal property management program of a bureau/office.

Reconciliation – The process of comparing two or more sets of records to make sure they are in agreement and of identifying errors, irregularities, and needed adjustments.

Record group (For archives only) – A collection of documents that share the same provenance (e.g., have the same records creator).

Report of Survey (Form DI-103) – Acted upon and finalized by a Board of Survey, this form describes the circumstances concerning the loss, damage, theft, or destruction of Government property; notes a charge of financial liability assessed against an individual or entity or provides for relief from financial liability; and is used to approve corrective actions, including financial recovery efforts and adjustments to property accountability records.

Scope of Collection Statement (SOCS) – The basic museum collections planning document required for all DOI units that are, or expect to be, responsible for managing museum collections. The SOCS defines the purpose of the museum collection, identifies the parameters of collecting activities, sets limits on collecting, and describes the uses and restrictions of the museum collection. The SOCS guides the unit's acquisition of museum collections that contribute directly to the understanding and interpretation of its mission, history, and resources, and/or compliance with applicable Federal laws.

Transaction-based inventory – An inventory method that uses electronic- or paper-based records of actions taken during a scheduled inventory cycle to verify the presence and condition of an object on the inventory list in lieu of physical inspection at the time of the inventory.

1.18 References.

Buck, Rebecca and Jean Allman Gilmore
2010 *Museum Registration Methods*, 5th Edition. Washington, D.C.: American Association of Museums Press.

Finch, Peggy Smith
1988 "The Essential Collections Inventory." In *Registrars on Record: Essays on Museum Collection Management*, ed. Mary Case. Washington, DC: American Association of Museums.

Holm, Stuart A.
1998 *Facts & Artefacts: How to Document a Museum Collection*, 2nd ed. Cambridge: Museum Documentation Association.

National Archives and Records Administration
2010 General Records Schedule 3, *Procurement, Supply, and Grant Records*, Section 9. College Park, MD: National Archives and Records Administration. <http://www.archives.gov/records-mgmt/grs/grs03.html>

APPENDIX 1

Random Sampling Table
With an expected rate of occurrence of not over 5%
(Confidence level 95%)

Total Collection Size*	Sample Size for Precision of ±3%
1-18	1-18**
20	18
30	26
40	33
50	40
60	46
70	52
80	57
90	62
100	67
125	77
150	86
175	94
200	100
250	111
300	121
350	129
400	135
450	140
500	144
550	148
600	152
650	155
700	157
750	160
800	162
850	164
900	166
950	167
1,000	169
1,100	171
1,200	174
1,300	176
1,400	177

1,500	179
1,600	180
1,700	181
1,800	182
1,900	183
1,950	184
2,000 - 2,199	185
2,200 - 2,399	186
2,400 - 2,499	187
2,500-2,699	188
2,700 - 2,899	189
2,900 - 3,299	190
3,300 - 3,499	191
3,500 - 3,899	192
3,900 - 4,499	193
4,500 – 4,999	194
5,000 – 5,499	195
5,500 – 6,499	196
6,500 – 7,999	197
8,000 – 11,499	198
11,500 – 12,999	199
13,000 – 18,999	200
19,000 – 31,999	201
32,000 – 149,999	202
150,000 and over	203

*Total collection size is the number of objects in the museum collection to be inventoried. If the total collection size falls between the listed numbers, use the next highest number.
** If the total collection size is 1-18 objects, then conduct a 100% inventory on the collection (e.g, if the collection size is 12 objects, then inventory all 12 objects).

APPENDIX 2

Recommended Agencies and Organizations to be Notified of Lost or Stolen Museum Objects

National Stolen Art File (NSAF)
Art Theft Program
Federal Bureau of Investigation
935 Pennsylvania Avenue, NW
Washington, DC 20535
Tel: 202-324-6668
www.fbi.gov/about-us/investigate/vc_majorthefts/arttheft/national-stolen-art-file/

The NSAF is a computerized index of stolen art and cultural property reported to the Federal Bureau of Investigation by law enforcement throughout the world. The database is accessible to the public for searches. The NSAF consists of images and physical descriptions of stolen and recovered objects, in addition to investigative case information. A request for investigation of an object valued at greater than $2,000 must come through a law enforcement agency and be accompanied by a physical description of the object, a photograph of the object if available, and a copy of any police reports or other information relevant to the investigation.

Stolen Art and Antiquities Program
INTERPOL Washington
U.S. Department of Justice
145 N Street, NE 12th Floor
Washington, DC 20002
Tel: 202-616-3900 (24hr Command Center)
www.interpol.int/Crime-areas/Works-of-art/Works-of-art/

INTERPOL's Stolen Works of Art Database centralizes information on international stolen artwork and cultural objects and circulates that information globally. The database is accessible to law enforcement officers via INTERPOL's secure global police communications system and the public who have been provided with specific access rights. In addition, certain types of data can be accessed by the general public, including the most recent stolen works of art reported to INTERPOL. A request for investigation of an object must come through a law enforcement agency. There are no limitations, such as value, on objects that may be reported to INTERPOL.

American Philatelic Society (APS)/Stamp Theft Committee
100 Match Factory Place
Bellefonte, PA 16823
Tel: 814-933-3803
stamps.org/Stamp-Thefts

The APS Stamp Theft Committee deals with thefts of stamps and can be contacted through their website. A stamp theft may be reported to law enforcement and then to the Committee, which will collect pertinent information about the case and send a detailed questionnaire and inventory loss form to victims. These documents become part of the confidential file maintained by the APS and are available to the Committee to help in identifying stolen property. The APS Stamp Theft Committee reports select stamp thefts to the FBI.

Antiquarian Booksellers' Association of America (ABAA)
Stolen Books Database
hq.abaa.org/books/antiquarian/databases/stolen_search.html

The Stolen Books Database contains information regarding stolen or missing rare and antiquarian books, prints, or maps as reported by ABAA members and the general public. The information provided through the Stolen Books Database is for informational and educational purposes only. The ABAA does not check or review the information reported to the Stolen Books Database, and thus cannot guarantee the accuracy, timeliness or completeness of the information.