

DEPARTMENT OF THE INTERIOR
DEPARTMENTAL MANUAL

Museum Property Handbook
(411 DM, Volume I)

Chapter 13 Professional Considerations

A. INTRODUCTION

The museum profession has established and adheres to recognized standards and practices for the proper management and care of museum property. Department of the Interior curatorial staff are linked to other museums by the following shared goals and objectives:

1. Body of Literature

There is a wide variety of general and technical literature available to Departmental curatorial staff on museums and collections management. The Departmental Museum Property Handbook is the principle Departmental publication on museum property management. It provides specific guidance on the documentation, preservation, and protection of the Department's museum property. The bibliography sections of each part of the Handbook provide a basic list of books and articles on topics relating to museum property management.

2. Standards

The Departmental "Checklist for Preservation, Protection, and Documentation of Museum Property" provides criteria for internal evaluation of the curatorial program in a unit against Departmentwide standards. Department of the Interior units are encouraged to seek accreditation by the American Association of Museums (AAM). This process evaluates the unit museum programs against national standards established by the AAM. Refer to Appendix B for AAM contact information.

3. Education and Training

Some bureaus offer bureau-specific curatorial training opportunities for their curatorial staff. In addition, many universities and colleges offer museum studies programs. Sessions on a wide variety of museum topics are presented at annual and regional meetings of the American Association of Museums and the annual meeting of the American Association for State and Local History. Technical workshops are provided by the Smithsonian

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Institution and by regional and state museums and organizations. Appendix B provides a description of the organizations and societies that provide leadership and technical and funding assistance.

4. Code of Ethics

a. Standards of Conduct for Departmental Employees

Preservation of the public trust is the guiding principle behind the laws, regulations, policies, and guidelines affecting employees of the Department of the Interior. The Department of the Interior guidelines for employee responsibilities and conduct are contained in 5 CFR Part 2635 and related supplement. Curatorial staff should demonstrate an awareness of the public trust involved in stewardship of museum property, the nation's heritage.

When an employee acts in a way that appears to use public property or public position for private gain, or when an employee shows disregard for the public trust, those actions reflect on the agency and all of its employees.

b. Standards of Conduct for Curatorial Staff

Curatorial staff is used in this section to include all Departmental employees who act on, have access to, or are accountable for museum property in the care of the Department of the Interior. Staff clearly included in this category are unit managers (accountable for all unit museum property), object conservators, museum curators, museum technicians, museum aids, housekeepers, interpreters, park rangers, and cultural or natural resource specialists. If these employees have regular access to Departmental museum property, their actions should be guided by the following standards.

Curatorial staff, in addition to the standards of conduct that govern their activities as employees of

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the Department of the Interior, are expected to adhere to the Code of Ethics for Curators, as formulated by the Curators Committee of the American Association of Museums. Appendix C provides information on obtaining a copy of the Code of Ethics for Curators and other ethics statements of other specialists (e.g., registrars that emphasize documentation issues). Some of the ethical considerations for DOI curatorial staff are as follows:

1) Buying and Selling of Antiquities or Natural History Specimens

Antiquities, fossils, and other natural history specimens are three-dimensional objects that can be interpreted by people interested in the information they may provide. Some of these objects, collected or still in their original context, have been kept in public ownership for the benefit of all. **Employee trafficking in objects and specimens originating on public lands is illegal.**

2) Personal Collecting

Personal collecting in fields closely related to the resources of an employee's unit is sensitive, and requires great care to avoid real or apparent conflict of interest. Possible pitfalls are accusations of theft if an object is missing from the unit collection, of competing with the unit if an object is purchased that fits the unit's Scope of Collection Statement, or of graft if the employee does personal business with a dealer who also sells objects to bureau units.

Employees should refrain from collecting in areas related to their employment. If such a collection is maintained, employees should follow the guidance in the American Association of Museums' Code of Ethics for Curators. Employees should provide the responsible unit manager with

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an up-to-date inventory of the collection, keep the private collection separated physically from the unit collection, never acquire anything that has formerly been in a unit collection, and assure that the unit has first option to buy any objects within the unit's Scope of Collection Statement that the collector plans to buy or to sell. The same restrictions should hold true for

the employee's friends and relatives, who might be willing to act on the employee's behalf.

A special caution is necessary for collectors of natural history specimens. Many units of the Department of the Interior include prime ecosystems for the collection of rare species. All personal collecting by employees should be off-duty and outside the unit. Any specimens collected within the unit by employees or by others, and intended to be retained permanently, should be offered to the unit for accession into the unit's museum collection.

3) Appraisals

Appraising is an area that is subject to conflict of interest. Curatorial staff may assist a visitor with the identification of an object. However, the identification must avoid making any judgement relevant to monetary value. Curatorial staff should be particularly sensitive to the difference between identifying and appraising.

Department of the Interior employees should not assign values to non-DOI owned objects. The curator may assist a visitor by showing reference sources on the particular type of unidentified object, by providing names of a few appraisers, and by referring to the Internal Revenue Service donation regulations, if appropriate to the situation. **The curator must not appraise the object.** If a person decides to donate an object to the unit, it is the donor's responsibility to

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obtain an appraisal that meets Internal Revenue Service tax deduction requirements.

If asked for assistance, units should also be cautious not to favor particular appraisers for bureau contracts or for public referrals. Base the selection of an appraiser on qualifications and not on considerations that might be construed as showing partiality. When making public referrals, suggest several sources rather than one. Also ensure that any appraiser selected has

no personal or business interest in the objects involved.

4) Use of Collections

Personal use of objects from the unit collection by employees or their friends or by other private individuals is strictly prohibited.

Collections are meant to be used as reference, research, or exhibit material. This use should be consistent with the public trust responsibility that curators and other collection workers bear. **Employees should ensure that the use neither harms nor deteriorates the objects, nor that it reflects negatively on either the Department of the Interior or the employee.**

Interpretive uses need to be reviewed carefully to ensure that the use is not harmful to the object(s). While exhibit use may endanger an object, use of museum objects in living history demonstrations is generally inappropriate.

Human remains and sacred objects pose special responsibilities and, if associated with Native Americans, are subject to the provisions of the Native American Graves and Repatriation Act and its implementing regulations. They may have strong emotional and spiritual values for the family, culture, or religious group to which they

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pertain. A good principle to follow in these instances is to treat the remains and associated funerary objects in a manner appropriate to the group's cultural practices. Curatorial staff should meet with relatives, or members of the relevant cultural group associated with the object or remains in question as required by NAGPRA, in order to obtain their views of appropriate treatment of the remains and associated funerary objects.

5) Field Studies

For studies proposed to take place within unit boundaries, approval and oversight should be guided by the concept that the natural and cultural resources of a unit are assets for which unit staffs are held accountable by the American people. **All collections resulting from field studies conducted within a unit's boundaries remain the property of the government unless appropriate permits, specifying other ownership, have been obtained.** Any loss or diminution of a unit's resources should be offset by worthwhile justifications and by strong documentation of the action and preservation of the evidence.

Researchers should show the public benefit that may result from their studies of unit resources. They should be able to show that they are qualified to conduct the research, backed by a responsible institution, able to provide for the expeditious publication of the results, and capable of preserving the objects and associated field records in perpetuity at the unit or at a repository.

For ethnographic and historical studies, and others that may include research outside the unit, the same responsibilities exist, plus the extra concern for the unit's relationships with its neighbors. The personal privacy of informants must be respected, along with the

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property rights of landowners on whose property part of the research may be conducted.

6) Outside Professional Activities

Departmental curatorial staff often have the opportunity to pursue professional activities and interests outside their job responsibilities. Such activities may be paid or volunteered and may be in the same community or some distance from the unit. Whatever the circumstances, the staff member should realize that his or her actions, even in an unofficial capacity, reflect on the Department of the Interior. **Therefore it is of primary importance that there be no conflict or apparent conflict of interest between these outside activities and the individual's job responsibilities.**

Any outside activities should be cleared with the employee's supervisor and the appropriate ethics counselor before they are begun. Outside activities that offer even the slightest possibility for an apparent conflict of interest require extreme scrutiny. Departmental regulations relating to outside work and interests are contained in 43 CFR 20.735-23. **Dealing is specifically not approved in the AAM Code of Ethics for Curators.**

It is important to recognize the benefits that appropriate outside activities can bring the unit and the Department: an individual whose knowledge and expertise are recognized beyond the Department of the Interior can improve the public's understanding of DOI missions and open channels of communication and cooperation that might otherwise remain closed. As long as the activities do not affect an employee's job performance, operating a private consulting or research service, teaching, participating as an AAM Museum Assessment Program Consultant or accreditation team member, or serving a local or

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regional museum association can be very beneficial. 43 CFR 20.735-10 states that an employee shall not teach, lecture, or write using information obtained because of his or her Government employment, except when that information has been or on request will be made available to the general public.

Keep in mind that employees are prohibited from using their official titles in conducting private business or participation in private or public group activities. Use is strictly limited to those occasions and circumstances where representation is official (43 CFR 20.735-17 [0]).

If staff have any questions regarding the applicability of the regulations, or need advice concerning a specific situation, consult the supervisor and the bureau's Ethics Counselor.

B. CURATORIAL HEALTH AND SAFETY

Museum collections may contain a number of types of materials that without proper awareness and precautions pose a health and safety risk to curatorial staff and to the public, especially researchers. These include, but are not limited to: radioactivity and toxic chemicals including carcinogens and gasses from geological specimens; unexploded ordnance and ammunition in firearms and cannon; germs and controlled substances in medical collections; arsenic used to preserve natural history specimens; and cellulose nitrate negatives. In addition, curatorial staff use a wide variety of materials in management and care of museum property, including toxic and flammable solvents, pesticides, fumigants, and preservatives. Curatorial staff should work with unit and bureau safety specialists to ensure that health and safety issues encountered in working with museum property are addressed in the unit's Loss Control Management Program.

Traditional chemical methods used by museums to control biological infestations in collections have been fumigation

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and the topical application of pesticides to artifacts and specimens. Fumigation is the technique of introducing a toxic gas into a fixed space that contains objects. These pesticides and their residuals remain extremely active for long periods of time after their initial application. **All specimens collected prior to 1970 should be examined for evidence of these pesticides before being handled.**

1. Health Concerns

Fumigants and pesticides pose serious health risks to curatorial staff and visitors. Consequently, the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) of 1972 as amended, permits the use of only those formulations that have received an Environmental Protection Agency (EPA) registration number. The labels and Material Safety Data Sheets (MSDS) contain vital health and safety information. Two fumigants that are particularly hazardous to curatorial staff, ethylene oxide and paradichlorobenzene, are discussed below.

2. Ethylene Oxide (EtO)

Ethylene oxide is a fumigant fungicide and insecticide that has been used to fumigate books and archival materials, furs, textiles and furniture. Current strict standards for use established by OSHA in June 1984 are available in 29 CFR 1910.1047. This standard applies to all institutions using the chemical as a fumigant and to all persons handling objects that have been fumigated with EtO, thus covering all on-site and contract fumigation.

3. Paradichlorobenzene (PDB)

Paradichlorobenzene (PDB) traditionally has been used in museum property collections primarily as a moth repellent and inhibitor of mildew and other fungi. Like all fumigants, this material is toxic to humans. Because of

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potential health effects, paradichlorobenzene must not be used routinely as a repellent. Monitoring for insect and microbiological infestation, as part of the Integrated Pest Management Program, is the preferred method for reducing the risk of biological damage to museum property.

4. Arsenic

Arsenic can be readily absorbed through the skin, inhaled and ingested. This substance can cause acute symptoms or may lead, over the years, to chronic disorders. Children and persons with an existing health problem are particularly susceptible to the effects of this substance. In working with bird and mammal specimens collected and prepared prior to the middle 1950's, exercise precautions in handling biological specimens.

The Hazard Communication Standard

In accordance with OSHA's 29 CFR 1910.1200 (Revised 1987), each unit is required to implement a program to communicate essential information on chemicals and/or hazardous materials to employees in the workplace. The Hazard Communication Standard (HCS) is similar to the "Right-to-Know" laws passed by several states. In the museum property work space this standard requires the following procedures:

- ! Inventory all hazardous substances
- ! Obtain and maintain Material Safety Data Sheets
- ! Label all hazardous substances
- ! Receive training in the Hazard Communication Standard.

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