

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240  
<http://www.blm.gov>

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Instruction Memorandum No. 2007-191  
Expires: 09/30/2008

**To:** ADs, SDs, and CDs

**From:** Director

**Subject:** Stewardship and Accountability for the Bureau of Land Management (BLM) Museum Collections: Coordinating with Repositories Housing the BLM's Museum Collections

**DD:** 10/01/07 – Implement "Repository Receipts for Collections" Form; 11/15/07 – Submit Five-Year Plan for Conducting Repository Evaluations;  
03/31/08 – Submit State Office Plan for Establishing Agreements with Repositories

**Program Area:** Museum Collections Management/BLM

**Purpose:** This Instruction Memorandum (IM) establishes and reiterates the BLM policy to preserve, protect, and document museum collections originating from public lands. This IM requires State Offices (SOs) to implement the recommendations issued in the Office of Inspector General (OIG) Audit 99-I-808. Addressing this audit by the end of Fiscal Year (FY) 2007 is a Management by Objective (MBO), and supports the BLM's performance goal to close outstanding audit recommendations.

**Background:** The BLM acquires museum collections through land management activities. Most of the BLM's museum collections are curated in external museum and university repositories. Federal regulation 36 CFR Part 79, Curation of Federally Owned and Administered Archaeological Collections, and Part 411 of the Departmental Manual (DM411) provide standards for managing the BLM's museum collections. The BLM's procedures for permitted cultural resource collections have been established in the BLM 8150 Manual Section (MS), Permitting Uses of Cultural Resources. The BLM procedures for permitted paleontological collections have been established in the BLM MS 8270, Paleontological Resource Management and the accompanying Handbook (H) 8270, Chapter IV, General Procedural Guidance for Paleontological Resource Management Permitting.

In 1999, the OIG conducted an audit of the BLM's collections management activities and determined that the BLM needed to implement additional policies and procedures to provide for the on-going stewardship and accountability of the BLM's collections. The two audit recommendations that remain open are:

B2. Inventory. "Ensure that the Bureau's revised Collections Management Plan includes procedures for permittee and repository confirmation to the Bureau of receipt of Federal (Bureau) collections, including a brief description of the collected objects. Also, both Federal (Bureau) and non-Federal repositories should be requested to identify, in accordance with the repositories' capabilities, the Federal (Bureau) collections. Thereafter, the reported inventory information should be validated periodically."

B3. Curation Agreements. "Contact all Bureau Museum Partnership Program repositories to determine the feasibility of initiating repository agreements regarding the management of Federal (Bureau) collections. Also, written repository agreements should be developed and executed with those non-Federal repositories willing to participate in a repository agreement process."

This IM emphasizes compliance with existing authorities, builds on current SO activities, and establishes a program for a coordinated process for developing agreements with repositories and conducting cyclic repository evaluations and inventory reviews.

**Policy:** The BLM upholds its stewardship and accountability responsibilities for museum collections in external repositories by establishing agreements with repositories housing BLM museum collections, periodically reviewing the inventory of these collections, and verifying that collections made under BLM-issued permits are deposited in an appropriate repository in a timely manner.

**Implementation:**

1. Establish Memoranda of Understanding (MOU) with Repositories. All SOs will enter into MOUs with federally approved and BLM-verified repositories that hold BLM museum collections to ensure the long-term care of collections recovered from, or collected in association with, cultural resources or paleontological localities on BLM-administered public lands. The MOUs should articulate the roles and responsibilities of both the BLM and the repository, and be consistent with 36 CFR Part 79 and DM411. The National Curator is available to provide assistance in developing these agreements, including providing sample MOUs.

For repositories that hold collections from multiple BLM jurisdictions, SOs are encouraged to partner with each other to establish one agreement for all BLM-administered collections held by a repository. The National Curator will help coordinate this effort by informing SOs of repositories that hold collections from multiple BLM SO jurisdictions and annually distributing an updated list of repositories. During FY 2007, the National Curator compiled a list of repositories known to hold the BLM's museum collections, and a list of repositories that potentially hold the BLM's museum collections. This list was provided to the SOs through the FY 2007 Data Call for Annual Reports on BLM Museum Collections (IM 2007-142), for SOs to review and update. The National Curator will compile the SO responses into an updated repository list and provide to SOs by October 1, 2007, to help inform SO plans for coordinating MOUs with repositories.

The SOs do not need to establish new MOUs with those repositories that already have active agreements in place with the BLM. Further, SOs are not required to establish MOUs with repositories that are unwilling to enter into a partnership arrangement with the BLM. It is recognized that there are many "legacy collections" from early investigations held by repositories that do not currently collect BLM materials. However, no new collections from BLM-administered public lands should be deposited into a repository that is not willing to participate in an MOU.

**Action:** By March 31, 2008, SOs should submit an action plan to the National Curator on how they will implement this policy, including benchmarks that will ensure that significant progress is made by FY 2012. All SOs are encouraged to prioritize those repositories that do not have an active agreement in place and hold the greatest volume of material and/or those that actively collect BLM material.

2. Periodically Review Inventory of Collections. To meet BLM's stewardship and accountability responsibilities, Washington Office (WO) and SOs will conduct periodic evaluations of repositories, including reviews of the collections inventory. The purpose of conducting repository evaluations is to ensure that the BLM's museum collections are properly curated and

available for research. These periodic evaluations should be scheduled as part of the annual work plan, and be organized on a cycle, in coordination with the WO, that will ensure that all verified repositories are evaluated every five years. Summary reports on repository evaluations and copies of DM411 checklists should be submitted to the National Curator, who will share this information with other BLM SOs that also have collections curated at the same repository.

Repository evaluations may be done in one of two ways: an on-site visit or off-site review. An on-site repository review should consist of a two-to-four-hour visit with repository staff, in addition to any travel time. The advantage of an on-site visit is to build rapport with repository staff and to ensure the accuracy of information in the repository evaluation form (DM411 checklist). For an off-site repository review, the repository evaluation can be completed by telephone, email, or correspondence with repository staff. Repository evaluations should include a review of repository policies, documentation systems, security protocols, and environmental controls to ensure collections are properly curated. The BLM staff time dedicated to these activities should be reported to Program Element BD, Heritage Collections.

All BLM staff assigned to conduct repository evaluations should be familiar with the requirements in 36 CFR Part 79 and DM411. The National Curator is available to provide supplementary guidance to SOs on how to conduct a repository evaluation and review of collections inventory, including use of the DM411 checklist, inventory testing procedures, and summary report formats.

**Action:** By November 15, 2007, SOs must prepare a schedule of planned repository evaluations and inventory reviews for FY 2008, in accordance with the FY 2008 1050 budget directive. All the SOs should also prepare a schedule of tentative repository evaluations for FY 2009 through FY 2012 to ensure that all repositories within their SO jurisdiction will be evaluated during the next five years. The SOs are encouraged to plan for evaluations of 25-percent of the repositories within their SO jurisdiction per year. All SOs should also identify SO and Field Office staff with the training and skills necessary to conduct these repository evaluations, and inform the National Curator of any training needs.

In preparing the FY 2008 plan, SOs are encouraged to use baseline condition information to prioritize repository visits, targeting those that do not have a condition assessment or those that were reported as being in poor or fair condition in response to the FY 2007 IM 2007-142. The SOs may also consider other factors for prioritizing repositories evaluations, such as targeting those that hold the largest percentage of their museum collections, those that recently began collecting the BLM's museum collections or those that hold significant legacy collections and have not been in recent contact with the BLM. All SOs are also encouraged to plan repository evaluations in conjunction with other activities located near repositories.

Once the SOs have submitted proposed schedules of repository evaluations, the National Curator will prepare a five-year plan, working closely with each SO to develop a feasible work plan, with consideration for the availability of staff expertise, the variation of the number of repositories within each SO jurisdiction, the number of repositories with collections from more than one State, and the number of repositories located in the East.

3. Ensure Permitted Collections are Deposited in a Federally Approved Repository in a Timely Manner. The BLM must ensure that collections recovered from BLM-administered lands are deposited in an appropriate repository in a timely manner, as part of permit oversight responsibilities stated in MS 8150.11E, Curation Agreements are Required Regardless of Use Authorized. The SOs must ensure compliance with MS 8150.12.B4, Certification by Curatorial Facility, which states that permit applicants must provide the BLM certification that the properly authorized official of an appropriate repository has agreed to curate any artifacts, specimens, and

associated records generated during the proposed term of the permit. Many repositories have a standard form or letter used to establish a curation agreement. In absence of a standard repository form, sample permittee-repository curation agreements are available from the National Curator.

The "Certification of Collections' Deposition Statement" form has been updated to provide useful information for the SO oversight of museum collections and to aid in efficient reporting to WO, and is attached to this IM as Attachment 2, "Repository Receipt for Collections." A receiving document generated by the repository may be substituted if it contains the same information as the "Repository Receipt for Collections" form. Completion of this form, or equivalent, is required to close out any cultural or paleontological collecting permits. Collections should be deposited in the appropriate repository within one year of completion of the permitted project.

**Action:** Beginning on October 1, 2007, BLM SOs must implement use of the "Repository Receipt for Collections" form, or equivalent. All SOs should ensure that permit stipulations include a requirement for use of the "Repository Receipt for Collections" form, or equivalent, and maintain copies of these forms in filing systems so that they are readily accessible. The SOs should use data provided on these forms to document new collections and keep this data associated with relevant site records to aid in research, resource management, and to aid in efforts to streamline efficient reporting. Copies of all "Receipts for Collections" forms, and equivalents, must be submitted to the National Curator within the same fiscal year of submission to the SO. The SOs should also make efforts to consolidate "Certification of Collections' Deposition Statement" forms previously submitted by permittees into these files.

**Time Frame:** This IM is effective upon receipt.

**Budget Impact:** This policy is in accordance with existing Federal mandates and Departmental directives. Implementation activities are included in 1050 base funds provided to SOs.

**Manual Sections Affected:** This IM emphasizes the requirements in BLM MSs 8150 and 8270. MS 8160, Managing Museum Collections reserved is in development and has not been issued. This IM will be incorporated into the 8160 MS.

**Coordination:** Michael Ferguson, Assistant Director, Business and Fiscal Resources, AD-800.

**Contacts:** Questions or concerns regarding this policy should be addressed to the Bud Cribley, Deputy Assistant Director, Renewable Resources and Planning (AD200), at (202) 208-4896 (Bud\_Cribley@blm.gov), Carolyn McClellan, Division Chief of Cultural, Paleontological Resources and Tribal Consultation (WO240) at (202) 452-5090 (Carolyn\_McClellan@blm.gov), and Emily Palus, BLM National Curator and NAGPRA Coordinator, Division of Cultural, Paleontological Resources and Tribal Consultation (WO240) at (202) 452-7721 (Emily\_Palus@blm.gov).

Signed by:  
Henri R. Bisson  
Acting, Director

Authenticated by:  
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Division of IRM Governance, WO-560

2 Attachments

[1 - Definitions \(1 p\)](#)

[2 - Repository Receipt for Collections Form \(2 pp\)](#)