

Dr. Frank McManamon
National Park Service
1849 C St., NW
Archeology Program (2275)
Washington, DC 20240

September 18, 2006

Dear Dr. McManamon:

I am writing on behalf of the Council for Maryland Archeology (CfMA) to offer recommendations from Maryland archeologists regarding deaccessioning of archeological collections in curation facilities. CfMA was founded in 1976 to foster public awareness, concern, and responsibility for the conservation of archeological resources in Maryland. Members include a wide range of professional archeologists who work to promote research, preservation, and management of archeological heritage in Maryland.

CfMA took up the topic of deaccessioning at the suggestion of collections professionals who realize that curatorial facilities are filling up fast, and the pressure to deaccession is increasing, yet there is not a consensus in the archeological community about how to appropriately deaccession archeological materials. In the past, CfMA examined standards for processing and packaging collections, and the recommendations they made served as the basis for standards later adopted by the State. CfMA therefore thought that it would be of service to do the same for deaccessioning.

We understand that you and your colleagues at the Department of the Interior are also in discussions about deaccessioning and are working to revise the 1990 draft regulations for deaccessioning that were not adopted as part of 36 CFR Part 79. Although we realize that the opinions of the archeological community on a national scale may differ from the consensus in Maryland, we nevertheless offer you the enclosed recommendations in case you find it useful to collect input from different regions about the topic.

The enclosed recommendations are the result of a year's worth of discussions about deaccessioning at meetings of CfMA and its collections subcommittees. CfMA first took up the topic of deaccessioning following the June 11, 2005 meeting. At that time, CfMA decided that the topic warranted two committees; one to discuss field and lab sampling strategies that reduce the size of collections before they make it to a permanent repository, and another to discuss deaccessioning archeological materials that are already in curatorial facilities for long-term storage.

The latter committee was co-chaired by Rebecca Morehouse, the archeological Collections Manager for the State of Maryland, and Sara Rivers Cofield, Curator of Federal Collections for the State of Maryland. Both Ms. Morehouse and Ms. Cofield work at the Maryland Archaeological Conservation Laboratory (MAC Lab), which is the primary archeological repository for the State of Maryland. The other two members of

the committee were Silas D. Hurry, Curator of Collections and Archaeological Laboratory Director at Historic St. Mary's City, and Betty Seifert, Chief Conservator, Deputy Chief, and current Acting Chief of the MAC Lab. These four individuals are experienced professionals in the field of archeological collections management, and are responsible for implementing State and Federal regulations as they care for Maryland's archeological resources.

As a first step, this committee decided to formulate some goals that a curatorial repository's deaccessioning policy should meet. They presented these goals to the general CfMA membership, and the membership joined them in comparing these goals to the draft 1990 deaccessioning guidelines (36CFR79.12) and to the State of Maryland's collections policy, which does include a process for deaccessioning.

The enclosed recommendations incorporate the goals that the membership agreed upon, and summarize the results of these thoughtful discussions among professionals. The members of CfMA hope that they may be of use as you pursue the challenge of proposing new deaccessioning regulations.

Sincerely,

Stephen S. Israel, President
Council for Maryland Archeology
www.smcm.edu/cfma

cc: Terry S. Childs, Ph. D.

Enc: Recommendations for Deaccessioning Archeological Materials in Curatorial Repositories

Recommendations for Deaccessioning Archeological Materials in Curatorial Repositories

By the Council for Maryland Archeology

Recommendation 1:

Archeological materials should not be deaccessioned if they have any archeological research value that cannot be retained through documentation.

Recommendation 2:

Decisions about deaccessioning collections that are already in a repository should not be made unilaterally by any one individual. One individual might nominate materials for deaccessioning, but a committee or consultation group should review each decision before it is approved.

Such a committee should include:

- A. The collections professional responsible for undertaking the deaccessioning project and its documentation,
- B. An archeologist with a particular expertise in the type of artifacts being deaccessioned (e.g., a lithics expert to look at flakes and fire-cracked rock),
- C. A professional with expertise on the particular time period in the relevant region.
- D. If deterioration is a factor in the deaccessioning decision, a conservator should also be consulted.

Recommendation 3:

All deaccessioning decisions should be made on a case-by-case basis. No one group of artifacts (e.g., bulk samples, soil samples, artifacts without context, non-site isolated finds, Phase I artifacts, etc.) will be a good candidate for deaccessioning all the time.

Recommendation 4:

If the collections being deaccessioned were donated to the repository by a private owner, that donor might be notified out of courtesy, but the collections should not go back into private ownership, and the repository should not be obligated to track donors down prior to deaccessioning a collection.

Recommendation 5

All deaccessioned artifacts must be properly documented. Minimally, the artifacts must be catalogued. Additional documentation such as photography and x-radiography should be at the discretion of the committee approving the deaccessioning decision.

Recommendation 6:

With regard to the disposition of artifacts that are deaccessioned, the following procedures are recommended in keeping with archeological ethics:

- A. Every effort should be made to keep deaccessioned artifacts in the public domain for educational purposes.
 - a. Collections might be transferred to another professional repository or research institution, or they might be donated to schools, museums, or other educational facilities.
 - b. Preference should be given to institutions that will retain the contextual organization of collections.
 - c. Archeologists might follow the example of the American Association of Museums by keeping a list of institutions that might be interested in receiving the materials. These institutions would then be notified that deaccessioned archeological materials are available for transfer.
- B. If there is no educational institution that wants the deaccessioned materials, the materials should be destroyed.
- C. Deaccessioned archeological materials should NOT under any circumstances:
 - a. Be sold.
 - b. Be given to a private collector.
 - c. Be presented as a souvenir, gift, or award to any site visitor, staff member, volunteer, family descendant, etc.

Recommendation 7:

Sampling in the field and lab should be encouraged to prevent the burden that deaccessioning in repositories places on collections managers and curators who are forced to research collections and make assessments of significance. Principal investigators and other professional archeologists performing the excavations are better positioned to make sampling decisions and to document discards as a part of the initial processing of the collection.

Recommendation 8:

The time it takes for collections professionals to properly document and then deaccession archeological materials can be costly, but long-term curation is also very costly. CfMA recommends that grants be pursued to study the cost effectiveness of the deaccessioning process versus the cost of long-term storage. The results of such a study might bolster deaccessioning regulations and help institutions undertaking deaccessioning projects justify the pursuit of funding to support their efforts.