



COLLECTIONS MANAGEMENT

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1. PURPOSE

Smithsonian Directive (SD) 600, *Collections Management*, is the principal policy document guiding Smithsonian collections management. As the Smithsonian's collections management policy, SD 600 guides collections stewardship to ensure proper management, preservation, and use of the Institution's collections and items in its care and custody.

This directive covers all aspects of collections management, including acquisition and accessioning, deaccessioning and disposal, preservation, documentation, life-cycle management, inventory, risk management, safety and security, access, storage, loans, and intellectual property management. This directive also addresses specific legal and ethical issues that pertain to collections, including shared stewardship and ethical returns, Native American and Native Hawaiian human remains and objects, cultural property, biological material, and objects unlawfully appropriated during the Nazi era.

SD 600 establishes and implements policies consistent with the [Smithsonian Collections Management Guidelines](#) approved by the Board of Regents and issued by the Secretary in May of 1999.

Additional policy and procedural guidance implementing the provisions of this directive is available on the National Collections Program [SharePoint](#) site.

2. BACKGROUND

The stewardship of collections is fundamental to the Smithsonian's mission to increase and diffuse knowledge. Smithsonian collections are a national and global resource accessed each year by millions of visitors and researchers who use traditional methods and digital platforms to explore every subject, from aeronautics to zoology. Through its collections, the Smithsonian expands knowledge through high-impact research, documents our national identity, values, and cultural diversity, and increases public understanding of the world, its history, and our shared future.

Assembled throughout the Institution's history, the national collections are fundamental to the Smithsonian's mission, strategic priorities, and programmatic goals and serve as the intellectual base for scholarship, discovery, exhibition, and education. Smithsonian collections have a unique and vital role in documenting and addressing challenges facing society, such as the effects of climate change, structural racism, global pandemics, and the loss of biological and cultural diversity and its impact on global ecosystems and cultures.

Smithsonian collections represent a diverse range of materials and disciplines, including works of art, historical artifacts, natural and physical science specimens, living animals and plants, images, archives, libraries, audio and visual media, and born-digital material. Together, these collections preserve the past, increase our understanding of society and the natural world, and support the research that expands human knowledge in the arts, humanities, and sciences.

To properly manage collections, the Institution must deliberately develop, acquire, document,

steward, preserve, use, and refine its collections. The Smithsonian carries out its collections stewardship responsibilities through systematic collections management policies, procedures, and plans based on professional and discipline-specific best practices to ensure strict adherence to legal, ethical, and professional standards related to the Smithsonian's diverse collections management activities. Smithsonian collecting units share responsibility for the stewardship of the national collections, with each unit maintaining collections unique to its purpose, character, and role in achieving the Smithsonian's mission.

As stewards of the national collections, held in trust for the public, the Smithsonian has a unique responsibility to properly manage, preserve, and make accessible the collections in its care for current and future generations to appreciate, enjoy, and study. Through SD 600 and the collections management policies of individual collecting units, the Smithsonian affirms its commitment to communities represented in our collections and a shared future regarding knowledge-sharing, collaborative engagement, and ongoing stewardship.

3. APPLICABILITY

This directive applies to all Smithsonian units authorized to acquire and manage collections (hereafter, "collecting units"). To formally be designated as an authorized collecting unit, the unit must obtain the recommendation of the National Collections Program (NCP), the Under Secretary for Museums and Culture, the Under Secretary for Science and Research, the Deputy Secretary and Chief Operating Officer, and the approval of the Secretary.

All Smithsonian collecting units must adhere to the policies set forth in this directive. Newly designated collecting units are subject to the [SD 600 New Collecting Unit Guidance](#) and the principles of this directive to guide their collections-related activities until a unit collections management policy is developed and approved.

4. AUTHORITY AND RESPONSIBILITIES

The acquisition and possession of collections impose legal, ethical, and professional obligations to provide proper management, preservation, and use of the collections and their associated information. Smithsonian collections management responsibilities are delegated as follows.

4.1. Board of Regents

The Act of August 10, 1846, codified at 20 *United States Code* (U.S.C.) §§ 41, et seq., established the Smithsonian and vested authority for conducting the business of the Institution in the Smithsonian Board of Regents. The Board of Regents retains ultimate oversight authority and responsibility for Smithsonian collections while delegating to the Secretary overall collections management authority.

4.2. Secretary

The Secretary is responsible for overseeing the establishment of appropriate policies and programs, through which the Smithsonian ensures compliance with applicable laws,

regulations, and professional standards concerning collections. The Secretary delegates to the Deputy Secretary and Chief Operating Officer, collecting unit directors, and other appropriate staff, the responsibility to implement established policies and carry out the direct, day-to-day management and care of Smithsonian collections.

The Secretary requires compliance with this directive by directing that development and implementation of collections-specific policies and plans be incorporated into the performance plans of the collecting unit directors, and that the Deputy Secretary and Chief Operating Officer and the Under Secretaries regularly review unit compliance with their policies and plans.

4.3. Deputy Secretary and Chief Operating Officer

The Deputy Secretary and Chief Operating Officer (hereafter, “Deputy Secretary”) supervises the Under Secretaries for Administration, Education, Museums and Culture, and Science and Research. In this capacity, the Deputy Secretary is responsible for supporting and holding accountable the Under Secretaries and their Smithsonian collecting units, research centers, and educational organizations’ implementation of their major strategic initiatives and programmatic goals.

4.4. Under Secretaries

The Under Secretaries for Administration, Education, Museums and Culture, and Science and Research share responsibility for ensuring Smithsonian collections are managed in compliance with this directive by providing central oversight to collecting unit directors.

While each Under Secretary is responsible for overseeing specific collecting units, the Under Secretary for Museums and Culture and the Under Secretary for Science and Research oversee the vast majority of collecting units and have the most direct responsibility for supervising collections management activities.

4.5. Director, National Collections Program

The NCP director provides central leadership, policy oversight, strategic planning, and support for Institution-wide collections initiatives.

The NCP director exercises these responsibilities by:

- serving as a principal advisor to Smithsonian senior leadership and collecting unit directors and staff on matters related to collections management policies, standards, and best practices;
- communicating, administering, and implementing this directive, and the issuance of additional guidance, as necessary, to implement the provisions of this directive and the review and revision of existing policy guidance;
- advising the Under Secretaries on the implementation of this directive, including the compilation of an annual report;

- coordinating the development, review, revision, and approval and monitoring of unit collections management policies and collections stewardship plans to ensure that Smithsonian collections are maintained according to Smithsonian policy, legal obligations, and professional standards; and
- working with senior management and collecting unit directors to develop long-term strategies and priorities to address Institution-wide collections needs, including collections care and space, and the allocation of central collections care resources.

4.6. Collecting Unit Directors

Each collecting unit director is responsible for:

- providing unit policy guidance, program direction and planning, and budgetary support to carry out the requirements established by this directive;
- establishing, approving, and implementing an up-to-date unit collections management policy;
- establishing, approving, and implementing an up-to-date unit collections stewardship plan to establish an intellectual framework and implementation strategy for collections development, acquisition, refinement, and resource allocation decisions;
- approving unit inventory plans and ensuring plans are appropriate to the nature, characteristic, and size of the unit's collections, staff resources, and any unit-specific requirements, and receiving reports on the results of inventories;
- approving and implementing an up-to-date unit digitization plan in accordance with [SD 610, *Digitization and Digital Asset Management Policy*](#);
- ensuring unit strategic plans include collections-specific elements;
- delegating authority and assigning collections responsibilities to appropriate unit staff;
- implementing and monitoring the unit's collections management policy, procedures, goals, and reporting on collections-related information, such as the Collections and Digitization Reporting System (CDRS) and the Collections Space System (CSS);
- allocating resources for and aligning training of unit collections staff with the requirements of unit strategic plans, professional standards, job descriptions, delegated authority, and assigned responsibilities; and
- ensuring unit compliance with this directive and unit collections management policy, including the submission of an annual report.

4.7 Collecting Unit Advisory Boards or Commissions

A collecting unit may have an advisory board or commission, created by the Board of Regents, pursuant to federal law, or by agreement, to provide advice and assistance to the Board of Regents, the Secretary, and collecting unit directors.

The role of advisory boards or commissions with respect to collections shall be specified in bylaws approved by the Board of Regents or the applicable approval authority.

By statute or legal agreement, the boards of the Archives of American Art, the Hirshhorn Museum and Sculpture Garden, the National Museum of the American Indian, and the National Museum of African American History and Culture have authority for specified collections management decisions. This authority shall be carried out in accordance with the general policies of the Board of Regents and applicable directives established by the Secretary, including this directive.

4.8 Collecting Unit Staff

Collecting unit staff are responsible for carrying out assigned collections management responsibilities to ensure:

- implementation of this directive and unit collections management policies, procedures, and plans;
- adherence to applicable laws and professional ethics and practices;
- proper acquisition, management, preservation, and responsible use of collections throughout their life cycle; and
- the integrity of collections information.

4.9 Smithsonian Collections Advisory Committee

The Smithsonian Collections Advisory Committee (SCAC), chaired by the NCP director and composed of representatives from across the Institution, assists the NCP, senior leadership, and collecting unit directors in implementing this directive by advising on policies, priorities, initiatives, and funding strategies for collections management.

4.10 Other Central Offices and Directives

Other central offices providing collections management functions include the OGC the Office of Finance and Accounting (OF&A) Risk Management Branch, the Office of the Chief Information Officer (OCIO) and the Digitization Program Office (DPO), the Office of Contracting and Personal Property Management (OCon&PPM), the Office of Protection Services (OPS), Smithsonian Facilities (SF), the Office of Safety, Health, and Environmental Management (OSHEM), and the Office of Emergency Management (OEM).

Additional program-level guidance may be provided by other Smithsonian directives on matters related to collections management and the specific function and purpose of the other directive (see Appendix B: Related Directives and References).

5. ETHICS

The Smithsonian recognizes and accepts its responsibility to provide proper management, resources, preservation, access, and use of the collections and associated information it holds for the benefit of the public.

Smithsonian staff have legal, ethical, and professional obligations to discharge their official duties with honesty, integrity, and loyalty to the Institution, as set forth in the [Smithsonian Institution Statement of Values and Ethics](#) and [SD 103, Standards of Conduct](#). Smithsonian staff are expected to be aware of the standards of conduct issued by professional associations relevant to their disciplines and general responsibilities.

6. FINANCIAL ACCOUNTING FOR COLLECTIONS

Smithsonian collections are held for public exhibition, education, and research in furtherance of public service rather than financial gain. Collections are protected, kept unencumbered, cared for, and preserved, and they are subject to the requirement that proceeds from sales of collections are to be used for the acquisition of additional collection items or the direct care of existing collections. Accordingly, the Smithsonian does not treat its collections as assets for purposes of reporting in its financial statements. The Smithsonian adheres to the applicable financial reporting standards governing collections held in public trust.

The NCP is responsible for submitting to the OF&A the information required for disclosure on the Smithsonian's financial statement.

7. ACQUISITION AND ACCESSIONING

Acquisition is the act of gaining legal title to a collection item or group of items.

Accessioning is the formal process used to legally acquire and record a collection item or group of items into a collection.

The acquisition of collections is fundamental to ensuring the continual development and refinement of collections in support of the mission and programmatic goals of the Smithsonian. The acquisition of collections imposes legal and ethical obligations on the Smithsonian and its collecting units to provide proper planning, management, documentation, preservation, storage, and use of collections and their associated information. The Smithsonian observes the highest legal, ethical, and professional standards in the acquisition and care of collections. Acquisition and accessioning procedures are designed to ensure thoughtful, well-documented consideration of such decisions based on responsible stewardship planning and the long-term interests of the Smithsonian, the public, and the collection item.

Accessioned collections are subject to a high standard of care and comprise items the Smithsonian intends to keep, preserve, protect, steward, and document for an indefinite period for public exhibition, education, research, and/or other mission-enabling activities. Some collection items may be acquired and designated for non-accessioned status for exhibit, education, research, or consumptive use.

Non-accessioned collections still require the same acquisition documentation as accessioned collections for accountability and use.

7.1. Policy

The Smithsonian adheres to the following policies regarding the acquisition and accessioning of collections:

- 1) The Smithsonian may only acquire collections in accordance with established authority and only when consistent with established acquisition criteria, applicable law, and professional and Institutional ethics. All applicable federal, state, local, and international laws, treaties, regulations, and conventions will be observed and compliance documented.
- 2) The Smithsonian observes the highest legal, ethical, and professional standards in the acquisition and care of collections. The Smithsonian shall exercise due diligence in the acquisition and care of collections, including making reasonable inquiries into provenance to determine that the Smithsonian can acquire a valid title to the item(s) and that the acquisition will conform to all legal and ethical standards, including the [Smithsonian Institution Policy on the Acquisition of Art, Antiquities, Archaeological and Ethnographic Material, and Historic Objects](#).
- 3) The Smithsonian must gain legal title, or its equivalent, to all items acquired and recorded as accessioned or non-accessioned collections. The only exceptions to this policy are for (i) certain transfers of federal scientific collections, formally titled in the United States, for which the Smithsonian retains permanent custodial responsibility, and (ii) certain transfers of biological material from foreign countries, formally titled in the foreign country, for which the Smithsonian retains permanent custodial responsibility.
- 4) As a general rule, collections are acquired and accessioned only when there is a good-faith intention to retain them for an indefinite period of time. Certain types of collections, such as those acquired for consumptive use, fall outside of this rule.
- 5) If collections are acquired with a specific intent at the time of acquisition not to add them to the collections but rather to sell, exchange, or use them for financial gain, the NCP and OGC must be notified in advance.
- 6) As a general rule, the Smithsonian only acquires unrestricted collections. Common restrictions, such as retention by the donor of intellectual property rights, may be accepted following appropriate review and approval. Restrictions that would substantially limit the Smithsonian's ability to use or dispose of an acquisition may be accepted only after consultation with the NCP and OGC. Under no circumstances, however, may the Smithsonian agree to conditions requiring the retention or display of a collection item in perpetuity.
- 7) The Smithsonian may acquire collection items by a variety of methods, including gifts, bequests, purchases, exchanges, transfers, field collecting, and, in certain instances, through propagation or birth.

- 8) The Smithsonian provides responsible collections management through disciplined acquisition and accessioning procedures consistent with established Institutional standards of long-term stewardship, preservation, care, and use.
- 9) Potential acquisitions must undergo a rigorous evaluation process based on the following criteria:
 - consistency with the mission, strategic plan, and programmatic goals of the Smithsonian;
 - quality, physical condition, intellectual value, and significance;
 - documentation of legal title, provenance, and any restrictions on use;
 - size, volume, or quantity;
 - ability and resources to provide appropriate management, care, and accessibility, including documentation, conservation, long-term preservation, digitization, and storage; and
 - potential for exhibition, education, and research use.
- 10) Deeds of gift, gift agreements, bequest documents, and other documents evidencing a gift to the Smithsonian should be signed by the donor or, in the case of a bequest, their executor or personal representative, and by the appropriate collecting unit director or the director's designee, or another authorized Smithsonian official. The OGC must review and approve all standard deeds of gift or gift agreements and any substantial alterations to these standard forms. Collecting units must also obtain the review and approval of the OGC for any bequest documents requiring signatures.
- 11) When acquiring collections by gift, the Smithsonian shall provide written acknowledgment of the gift with a letter to the donor within 30 days following the completion of the gift. The letter must acknowledge receipt of the donation, state whether or not any goods or services were provided to the donor in return for the gift, and include appropriate tax disclosures. The OGC has established standardized acknowledgments and may be consulted regarding tax requirements.
- 12) The Smithsonian may only acquire collections after considering the obligations of long-term stewardship to determine that it can reasonably anticipate the ability to meet such responsibilities with existing and projected resources over the life cycle of the collection. The appropriate Under Secretary or Under Secretaries, following consultation with the NCP, must approve the acquisition of any collection item that would require substantial resources beyond a collecting unit's allocated budget or substantial resources of other Smithsonian units for the management or preservation of the collection.
- 13) When determining whether to acquire collections, the Smithsonian will consider sharing existing, renovated, or new collections storage spaces based on space, type, and environmental needs.

- 14) While overlap in collecting among Smithsonian collecting units is inevitable, competition for a particular acquisition is inappropriate. When more than one collecting unit seeks to acquire the same collection item, the respective unit directors must agree on which unit will acquire the collection item or consider pursuing a joint acquisition/ownership agreement. In those rare cases when the placement of a collection item cannot be resolved by the directors, the Deputy Secretary will decide after consultation with the NCP and the appropriate Under Secretary or Under Secretaries.
- 15) On occasion, collecting units may jointly acquire collections with other museums, educational organizations, or other Smithsonian collecting units with which they agree to share ownership and management. In such circumstances, a written agreement that stipulates the terms and conditions of the joint acquisition/ownership arrangement and the responsibilities of each party must be formalized and approved before final acceptance. The NCP and OGC must be consulted in advance of such cases, and in certain circumstances the collecting unit(s) must obtain approval from the appropriate Under Secretary or Under Secretaries, who may consult with the Deputy Secretary as appropriate.
- 16) The Smithsonian will avoid competitive bidding with federal organizations for collection items of common interest and will seek mutually acceptable agreements whenever the potential for competitive bidding with such organizations becomes apparent.

8. DEACCESSIONING AND DISPOSAL

Deaccessioning is the process used to formally approve and record the removal of a collection item or group of items from an accessioned collection.

Disposal is the act of physically removing a collection item or group of items from a collection.

Deaccessioning and disposal are legitimate components of responsible collections management. The periodic review, evaluation, deaccessioning, and disposal of existing collections is intended to refine and improve the quality and relevance of collections with respect to the Smithsonian mission. The Smithsonian acquires collections only when there is a good-faith intention to retain them for an indefinite period of time. Collections are retained as long as they can be properly maintained and used and align with the collections stewardship objectives of the Institution.

The acquisition and possession of collections impose legal and ethical obligations founded on public trust. For this reason, decisions concerning the deaccessioning and disposal of collections require careful planning and analysis, an appropriate justification, and due diligence. Deaccessioning and disposal procedures are designed to ensure thoughtful, well-documented consideration of such decisions in the context of the long-term interest of the Smithsonian, the public, and the collection item.

8.1. Policy

The Smithsonian adheres to the following policies regarding deaccessioning and disposal of collections:

- 1) The Smithsonian may deaccession and dispose of collections only when consistent with deaccessioning and disposal criteria and approvals, applicable law and professional and Institutional ethics, and any other applicable restrictions. All applicable federal, state, local, and international laws, treaties, regulations, and conventions will be observed and compliance documented.
- 2) Deaccessioning and disposal may occur for a variety of reasons, including:
 - Lack of capacity to provide proper stewardship;
 - Deterioration of collection items beyond repair or usefulness;
 - Duplication or redundancy of collection material;
 - Insufficient relationship between an item(s) and the mission, programmatic goals, or collections stewardship plan of the collecting unit, such that the item would be better placed elsewhere;
 - Ethical returns;
 - Repatriation;
 - Collection items containing hazardous materials which present threats to other items or create significant health and safety risks to staff or the public;
 - Selection for educational or consumptive use; and
 - Reconciliation of collections accessioned in error.
- 3) The Smithsonian may dispose of collections by a variety of methods, including donation, transfer, exchange, sale, repatriation, return, educational or consumptive use, destruction, destructive analysis, and, in certain instances, disposal by euthanasia or death.
- 4) Disposals resulting in a transfer of ownership to a third party must be documented in a written agreement approved by the OGC.
- 5) Disposals of deaccessioned collection items to foreign entities must comply with [SD 611, *Export Compliance and Trade Sanctions Related to Research, Export and Museum Activities*](#).
- 6) If the estimated value of a single collection item or a group of collection items considered for disposal is:
 - More than \$10,000 — requires a written, independent appraisal or informed estimate of fair market value.

- More than \$100,000 — requires two written, independent appraisals or informed estimates of fair market value and approvals from the NCP, OGC, the appropriate Under Secretary, and the Secretary.
 - More than \$500,000 — requires two written, independent appraisals or informed estimates of fair market value and approvals from the NCP, OGC, the appropriate Under Secretary, the Secretary, and the Board of Regents.
- 7) Documentation of proposed deaccessions may refer to any of the following valuation sources: written, independent appraisals; sales histories of the collection items or comparable items; or other standard valuation sources, including informed estimates by staff.
 - 8) The deaccession and disposal of collection items that, notwithstanding their monetary value, have significant research or historical value, or when the deaccession might create significant public interest, must be approved by the NCP, OGC, and the appropriate Under Secretary, who may consult with the Deputy Secretary and seek higher levels of authorization as appropriate.
 - 9) The disposal of non-accessioned collections does not require the same appraisal and approval processes as deaccessioning accessioned collections. Nevertheless, the disposal of non-accessioned collections should be conducted thoughtfully and consistent with the nature and importance of the items. The disposal of certain non-accessioned collections may warrant the same appraisal and approval procedures as accessioned collections. Collecting units shall consult with the NCP and OGC when considering the disposal of significant non-accessioned collections.
 - 10) Significant collection items manufactured by or for government entities, having no commercial or secondary markets, do not require appraisals of fair market value for deaccessioning and disposal. Deaccessioning and disposal of such collection items are subject to the following procedures:
 - Transfer of a duplicate collection item to a U.S. Government agency requires consultation with the NCP and OGC.
 - Transfer of a collection item to a Government agency or non-profit organization in the United States requires approvals from the NCP, OGC, and the appropriate Under Secretary, who may consult with the Deputy Secretary as appropriate.
 - Transfer of a collection item to a Government agency or non-profit organization outside the United States requires approvals from the NCP, OGC, the appropriate Under Secretary, and the Deputy Secretary.
 - 11) Smithsonian collecting units shall have a right of first refusal for collection items proposed for disposal, except as otherwise stipulated by authorizing legislation or other restrictions, or in the case of hazardous materials that present a health or safety risk. Such transfers are made without financial compensation, except when a collecting unit disposes of a collection item acquired through purchase. If required,

compensation shall be based on the fair market value of the collection item at the time of disposal or the value negotiated by the involved collecting units.

- 12) Under no circumstances may the ownership of any collection item that has been removed from a collecting unit be transferred, either directly or indirectly, to any employee, volunteer, officer, trustee, or [affiliated person](#) of the collecting unit or of the Smithsonian Institution.
- 13) Any proceeds realized from the sale of collection items may be designated only for collections acquisitions or the direct care of existing collections. Direct care may include:
 - Collections assessments and preservation surveys;
 - The purchase of collections storage equipment, housing materials, and supplies;
 - Conservation treatment and stabilization, and preservation of collections; or
 - Collections reformatting, re-housing, processing, documentation, inventory, cataloguing, and digitization.
- 14) Proceeds realized from the sale of deaccessioned collection items may not be used for operating expenses. Collecting units should consult with the NCP and OGC regarding the appropriate use of proceeds for direct care.
- 15) Collecting units that are members of the Association of Art Museum Directors (AAMD) may limit the use of sale proceeds for the acquisition of collections only as stipulated by the AAMD's policies on deaccessioning.

9. PRESERVATION

Preservation is the protection and stabilization of collections and their associated information through a coordinated set of activities aimed at minimizing chemical, physical, and biological deterioration and damage and preventing loss of intellectual, aesthetic, cultural significance, and monetary value.

Preservation, preventive care, and remedial conservation are integral components of collections management, ensuring collections are available for use. The ability of the Smithsonian to carry out its mission directly relates to its ability to preserve and safeguard collections, collections records, and other documentary materials for public benefit. Given the diverse nature and educational significance of Smithsonian collections, it is imperative to balance use and access with preservation needs.

9.1. Policy

The Smithsonian adheres to the following policies regarding the preservation of collections:

- 1) The Smithsonian shall provide the appropriate preservation, care, protection, and security for all collections and their associated information acquired, borrowed, or in the custody of the Institution.
- 2) The Smithsonian will balance current exhibition, educational, and research, use with the preservation requirements of collection items to ensure collections are properly maintained and rightfully serve their intended purpose.
- 3) Preservation policies, plans, and standards shall be developed in accordance with the intended purpose and use of collections and based on the principles of preventive conservation to ensure protection from the agents of deterioration. The Smithsonian should consider the American Institute for Conservation (AIC) [Code of Ethics and Guidelines for Practice](#) when developing preservation policies, standards, and procedures.
- 4) The Smithsonian is responsible for developing and implementing preservation strategies, policies, procedures, and plans for collections and collections information which respect the diverse nature and purpose of collections, including providing access.
- 5) The Smithsonian is committed to sustainability in the preservation and management of its collections, including the design, management, and maintenance of collections space and preservation environments in accordance with [SD 422, Sustainable Design of Smithsonian Facilities](#).
- 6) The Smithsonian aims to provide and actively manage optimized preservation environments based on a balance of scientific research, engineering capability, collections management protocols, and environmental impact. Collecting units, Smithsonian Facilities (SF), and the NCP shall support collaborative, evidence-based, decision making processes among the professional disciplines and stakeholders who share responsibility for establishing and implementing sustainable collections environments, as outlined in the [Smithsonian Institution Declaration on the Collections Preservation Environment](#).
- 7) Any conservation intervention, restoration, destructive sampling, or consumptive use of collection items must be authorized, documented, and justified for the purpose of preservation or professional scholarship.

10. COLLECTIONS INFORMATION

Collections information is the incremental, cumulative documentation of the intellectual significance, physical characteristics, legal status, use, provenance, and history of collection items, and the collections management processes and transactions they undergo. Collections information can be in analog or digital form and include text and images.

The Smithsonian relies on the well-documented results of scientific, historical, and aesthetic research to fulfill its mission. The Smithsonian acquires, develops, and maintains collections

information systems that enhance access to and accountability for its collections and research findings to ensure the long-term preservation of the resulting information in analog and digital formats. The value of collections information rests in its quality, integrity, availability, and potential for use and public access.

10.1. Policy

The Smithsonian adheres to the following policies regarding collections information:

- 1) Collections information systems must support the mission and public access goals of the Smithsonian.
- 2) The systems of record for Smithsonian collections data include unit collections information systems (CIS) for information, the Smithsonian's enterprise-wide Digital Asset Management System (DAMS) for digital media assets, and the Smithsonian's enterprise-wide 3D repository for 3D data.
- 3) The Smithsonian is committed to placing collections information in publicly accessible digital platforms, implementing professional documentation practices and standards, and sharing collections information through collaborations among collecting units, other educational and research institutions, and the public. The Smithsonian maintains its digital assets to advance the Smithsonian's mission, support its strategic and programmatic goals, and facilitate access.
- 4) The Smithsonian seeks to provide the widest dissemination of its digital assets consistent with the stewardship, management, and preservation responsibilities for its collections. Following [SD 609, *Digital Asset Access and Use*](#), these obligations take into consideration a wide range of legal, ethical, and practical factors, and reflect the staff and financial resources to generate, maintain, and render digital assets publicly accessible.
- 5) In its commitment to increasing access to collections as broadly as possible, the Smithsonian launched the Open Access Initiative, dedicating eligible digital assets into the public domain with a Creative Commons Zero (CC0) license. Certain digital assets are not part of the Smithsonian's Open Access Initiative because their use is restricted, and they carry a Usage Conditions Apply designation. Use of digital assets can be restricted for various reasons specified in [SD 609](#). These reasons include, but are not limited to, copyright restrictions, restrictions imposed by donors, restrictions imposed by contracts, and restrictions due to the cultural sensitivity of the collection item.
- 6) The Smithsonian may restrict access to sensitive information involving privacy, collecting localities, security, storage location, value, intellectual property restrictions, and culturally sensitive content.
- 7) Business or financial records (e.g., vendor enrollment forms) containing personally identifiable information (PII) or sensitive PII (sPII) about individuals associated with a

collection item (i.e., artists, donors, collectors, or researchers) are subject to [SD 118, *Privacy Policy*](#).

- 8) Collections information, including all records of collections-related decisions and activities, must comply with established Smithsonian and collecting unit standards and be maintained according to accepted professional practices.
- 9) The Smithsonian is responsible for the development, maintenance, preservation, and retention of collections information. All media containing collections information are maintained for long-term use and must be preserved according to current professional standards.

11. INVENTORY

Inventory is an itemized listing of collection items, groups, or lots that identifies the current physical location of each item, group, or lot; the process of physically locating all or a selection of items for which the collecting unit is responsible; and appropriate information to facilitate research, collections management, security, and access.

Effective collections management requires an inventory system to support decisions regarding the management, use, growth, storage, intellectual control, value, condition, physical information, and security of collection items. Inventory records serve as a tool for accountability and are useful in supporting other Smithsonian programs when augmented with additional documented information.

11.1. Policy

The Smithsonian adheres to the following policies regarding the inventory of collections:

- 1) Inventories of collections are conducted in accordance with established authority, inventory processes, and a written inventory plan appropriate to the purpose, character, and size of the collections in the collecting unit's care and staff resources.
- 2) Inventories of collections shall be conducted according to a predetermined schedule. Inventories may include a complete inventory, a specific percentage or sampling of the collection, or project-oriented inventories conducted during collections moves, rehousing, or digitization, using predetermined, statistically sound inventory methods.
- 3) Inventory control requires creating and maintaining reliable information about the identification, location, and presence of collection items. Inventory is a critical component of ongoing collections documentation.

12. RISK MANAGEMENT, SAFETY, AND SECURITY

Risk Management is the process of identifying and evaluating risk to prevent or minimize exposure to factors which may cause loss or damage to collections or injury or illness to staff and the public.

Safety encompasses occupational health and safety, industrial hygiene, and environmental management.

Security encompasses an entire range of activities concerned with the protection of life, facilities, and property, including collections, from direct or perceived threats.

The programmatic activities of the Smithsonian naturally expose collections to certain levels of risk of damage or loss during exhibition, loan, transit, storage, research, treatment, or handling. Collection items may also contain a wide range of chemical, biological, and physical hazards, whether inherent in the nature, composition, or construction of the item itself or as a result of preparation, treatment, alteration, or degradation.

Certain collections-related activities may expose staff and affiliated persons to residual hazardous materials associated with a collection item, storage equipment, or exhibit case materials. The Smithsonian has adopted an integrated risk management assessment program to mitigate exposure to a variety of risks by requiring the thoughtful review of potential hazards, including natural and human-made emergencies; climate change; vandalism and theft; disease; space and environmental deficiencies; human error; mechanical or operational system failures; deterioration; and collections-based hazards.

12.1. Policy

The Smithsonian adheres to the following policies regarding the risk management, safety, and security of collections:

- 1) The Smithsonian shall minimize and control the level of risk of damage or loss to collections and injury and illness to staff, affiliated persons, and visitors through established risk management practices.
- 2) The Smithsonian will provide hazard awareness and establish safe work practice information in accordance with [SD 419, Smithsonian Institution Safety, Health, and Environmental Program](#). OSHEM is responsible for the direction, planning, and technical supervision of occupational safety, health, and environmental protection at the Smithsonian.
- 3) All Smithsonian staff have an obligation to be aware of the Institution's risk management, safety, and security directives.
- 4) Except in extraordinary circumstances, the Smithsonian has chosen not to insure its own collections while in Smithsonian-owned facilities, either in storage or on display, and in the care and possession of the Institution. However, during transit between Smithsonian units and facilities, insurance can be placed on collection items.
- 5) Collections on loan to the Smithsonian and Smithsonian collections on loan to or in the custody of others will be insured as stipulated by an authorized loan agreement or negotiated contract. The OF&A Risk Management Branch coordinates Smithsonian risk management and insurance in accordance with [SD 108, Insurance and Risk Management](#).

- 6) Insurance proceeds from the settlement of claims for damage to Smithsonian collection items may be used only for the conservation and restoration of the affected collection item. Insurance proceeds received due to a total loss of a collection item or in excess of the cost of conservation and restoration of a damaged collection item shall be designated only for collections acquisition or the direct care of existing collections.
- 7) In accordance with [SD 420, Security Operations and Policies](#) and [Collections Space Security Standards](#), collecting unit directors, in collaboration with OPS, shall define the protection policy and goals for collections and ensure that such policies are implemented. Policies are based on risk assessments and consultations with unit staff and central offices such as the NCP and SF. The OPS is responsible for providing physical security and protection of personnel, visitors, collections, facilities, and property of the Smithsonian.
- 8) All Smithsonian facilities, owned or leased, must have a written, comprehensive emergency plan and procedures as required by [SD 109, Smithsonian Emergency Management Program](#). The OEM is responsible for the management and oversight of the Smithsonian Emergency Management Program.
- 9) The Preparedness and Response in Collections Emergencies (PRICE) team is responsible for providing Institution-wide training, policy, procedural, and logistical support in collections emergency preparedness, response, and recovery, promoting improved communication and collaboration across Smithsonian units.

13. ACCESS

Access is the opportunity for the public, scholars, and staff to explore and use the diverse collections and associated information resources of the Smithsonian.

The Smithsonian promotes access to its collections and associated information through research opportunities, traditional and digital exhibitions, educational programs and publications, reference systems, loans and exchanges of collections, and digital platforms.

13.1. Policy

The Smithsonian adheres to the following policies regarding access to collections:

- 1) The Smithsonian will provide access to its collections and associated information in a manner consistent with its stewardship, management, and preservation responsibilities. Physical and intellectual access to the collections must be balanced with preservation concerns.
- 2) The Smithsonian will control, monitor, and document physical access to and use of its collections.
- 3) The Smithsonian may be required to restrict access for various reasons, including resource limitations, security and safety, preservation constraints, object availability,

concerns related to cultural sensitivity and privacy, and legal restrictions (such as copyright and restrictions imposed by contract). Collecting units should consult with the OGC regarding access requests involving restrictions such as privacy and intellectual property rights.

- 4) The Smithsonian generally provides access to Smithsonian information under [SD 807, *Requests for Smithsonian Institution Information*](#), through the OGC. [SD 807](#) applies to transactional documents related to collections, such as gift and purchase agreements, but it does not apply to requests for other kinds of collections information. For requests for collections information other than transactional documents, the collecting unit responsible for the maintenance of the requested information handles the request in accordance with the unit's collections management policy and in consultation with the OGC, as necessary.
- 5) Requests for information citing [SD 807](#) or the Freedom of Information Act (FOIA) must be referred to the OGC.
- 6) The Smithsonian may charge fees to provide digital assets in response to access or use requests in accordance with [SD 609](#).

14. LOANS

A **loan** is the temporary transfer of possession of collection items for an agreed-upon purpose and on the condition that the collection items are returned at a specified time. Loans are not generated with the intent to result in a change of ownership.

Fundamental to the Smithsonian's strategic plan and programmatic goals, the lending and borrowing of collection items between Smithsonian units and other cultural, educational, and scientific organizations for public exhibition, research, and education is an integral part of the Institution's mission.

14.1. Policy

The Smithsonian adheres to the following policies regarding loans of collections:

- 1) All loans to or from the Smithsonian must adhere to applicable federal, state, local, and international laws, treaties, regulations, and conventions, including the [Smithsonian Institution Policy on Acquisition of Art, Antiquities, Archaeological and Ethnographic Material, and Historic Objects](#).
- 2) Smithsonian collection items may be lent or borrowed only in accordance with a written, authorized loan agreement and established authority, and only when consistent with applicable law and professional and Institutional ethics.
- 3) As a general rule, Smithsonian collections will only be lent for public exhibition, research, and other educational, scientific, or preservation purposes. Smithsonian collections may not be loaned for commercial purposes or private pecuniary gain.

- 4) The Smithsonian adheres to individual collecting unit guidelines for developing exhibitions and procedures for planning public programs, in accordance with [SD 603, *Exhibition, Program Planning, Research, and Educational Content*](#), and with the [Guidelines for Exhibiting Borrowed Objects](#) issued by the American Alliance of Museums (AAM).
- 5) All loans are for a specified period of time and may contain an option for renewal, if appropriate. The Smithsonian does not permit indefinite or permanent loans, whether as a lender or borrower.
- 6) Collections on loan to the Smithsonian and Smithsonian collections on loan to, or in the custody of others, will be insured as stipulated by an authorized loan agreement.
- 7) Requests from lenders for absolute liability — terms and conditions requiring the Smithsonian to agree to accept liability for damage or loss potentially in excess of insurance coverage — are subject to the following procedures:
 - Requests concerning a loaned collection item(s) with an insurance value of \$10 million or less require approval from the appropriate Under Secretary and the Under Secretary for Administration, in consultation with the OGC and the OF&A Risk Management Branch.
 - Requests concerning a loaned collection item(s) with an insurance value of more than \$10 million require approval from the Deputy Secretary, who may consult with the Secretary as necessary.
- 8) In addition to actual expenses, the Smithsonian may charge loan fees to borrowing organizations in accordance with approved collecting unit policies.
- 9) The Smithsonian may lend collection items for display in the offices of high-ranking U.S. Government officials, in accordance with the [Loans to High-Ranking Government Officials Guidance](#).
- 10) The Smithsonian may lend collection items to for-profit entities in accordance with the [Loans to For-Profit Entities Guidance](#).
- 11) The applicable provisions of the [Board of Regents Ethics Guidelines](#) govern loans to the Smithsonian from members of the Board of Regents.
- 12) The applicable provisions of the [Smithsonian Advisory Board Ethics Statement](#) govern loans to the Smithsonian from members of Smithsonian advisory boards.
- 13) Loans to foreign entities must comply with [SD 611, *Export Compliance and Trade Sanctions Related to Research, Export and Museum Activities*](#).
- 14) Regardless of the length or type of outgoing loans, the Smithsonian retains ownership and stewardship responsibility of its collections.
- 15) Smithsonian collecting units may accept items for temporary custody in accordance with unit collections management policies and under a temporary custody agreement.

- 16) The internal lending of collections for exhibition and public display among collecting units is fundamental to cross-unit collaboration and increasing public access to Smithsonian collections. Collecting units will, to the extent possible, facilitate and subsequently expedite exhibition and public display loans to other Smithsonian units, including newly designated collecting units, in accordance with the [Smithsonian Unit-to-Unit Object Loan Guidelines](#).

15. INTELLECTUAL PROPERTY RIGHTS

Intellectual property rights are protections based on federal or state statutes or common law such as patent, trademark, copyright, privacy, and publicity.

Distinct from the right to possess a collection item, intellectual property rights arise from the content of a collection item. The Smithsonian's ability to use and provide access to collections and their associated intellectual property may be subject to copyright, privacy, and publicity rights held by others, which may restrict access to or use of the material.

As both a holder and a user of intellectual property, the Smithsonian seeks to protect the intellectual integrity of collections and the rights of creators and owners of intellectual property, including the Institution itself as a rights holder, to promote the broadest possible access to collections for research and educational purposes.

15.1. Policy

The Smithsonian adheres to the following policies regarding intellectual property rights and collections:

- 1) Smithsonian collections may be subject to intellectual property rights that may be owned by the Smithsonian or others. The Smithsonian shall manage its collections and collections in its custody in a manner that avoids any infringement of intellectual property rights. The Smithsonian will protect the intellectual property rights of creators and intellectual property owners, including the Institution itself as a rights holder.
- 2) The Smithsonian may charge fees to outside organizations and individuals to use and reproduce images of collection items, in accordance with [SD 609](#).
- 3) The Smithsonian may rely on the doctrine of fair use in making reproductions of collections for standard museum purposes, such as for archival, research, educational, exhibition, and other similar uses. Fair use assertions must be made on a case-by-case basis, taking into consideration the legal parameters of the fair use doctrine, and the OGC should be consulted as necessary concerning fair use determinations.
- 4) Smithsonian collections may be used consistent with the current [Smithsonian Terms of Use](#).

16. SPECIFIC LEGAL AND ETHICAL ISSUES

Certain collections present specific issues because of applicable legal and ethical standards. Smithsonian collecting units that acquire, hold, or manage collections must take these legal and ethical issues into account, including incorporating appropriate standards into unit collections management policies. The following sections address six specific legal and ethical issues raised by Smithsonian collections that fall within the scope of the following.

Section 16.1 addresses shared stewardship and ethical returns of tangible and intangible cultural heritage collections; Section 16.2 addresses repatriation and other issues related to Native American and Native Hawaiian human remains and objects covered by the National Museum of the American Indian Act; Section 16.3 addresses provenance requirements for acquiring art, antiquities, archaeological and ethnographic material, and historic objects; Section 16.4 addresses requirements for borrowing, collecting, and managing biological material; and Section 16.5 addresses issues related to objects that have been or may have been unlawfully appropriated during the Nazi era.

16.1. Shared Stewardship and Ethical Returns

Over the course of its long history, the Smithsonian has acquired collections originating from national and international sources, from individuals, communities, and indigenous peoples, from non-profit, for-profit, and governmental entities, and through a variety of methods and circumstances. During this time, ethical norms and professional best practices related to collecting have changed, particularly with respect to collecting cultural heritage (tangible and intangible) from individuals and communities. As a result, the Smithsonian has collections that it would not have acquired under present-day ethical and professional standards.

Although the Smithsonian has legal title or custody of collections it holds in trust for the benefit of the public, continued retention or sole stewardship of such collections may cause harm to communities and be fundamentally inconsistent with the Smithsonian's ethical standards and Institutional values. In these unique circumstances, shared stewardship or ethical return may be necessary to fulfill the Smithsonian's custodial obligations.

The Smithsonian recognizes the value of community representation in Smithsonian collections, the benefit of preserving and making available to the public, with honor and respect, a diverse range of collections, stories, and histories, and the role of museums as collaborative custodians of cultural and historical legacies. The Smithsonian is committed to working transparently and in consultation with descendants, communities, and relevant governmental and regional stakeholders to consider matters of shared stewardship and the potential return of collections, based on ethical considerations. These circumstances, which may vary depending on the nature and scope of a unit's collections, may include but are not limited to the manner in which a collection was originally acquired and the context of its acquisition. A review of the circumstances may demonstrate unethical acquisition through means such as coercion, duress, assertion of power, or forcible taking.

The Smithsonian adheres to the following policies regarding shared stewardship and ethical return of objects in its collections.

- 1) Collecting units may enter into shared stewardship arrangements with communities represented in the unit's collections in appropriate circumstances, based on ethical considerations. Collecting units must establish authority and evaluation criteria and assign responsibility to approve, document, and implement such arrangements within the unit's collections management policy. Shared stewardship arrangements may include, but are not limited to, collaborative consultations for the respectful attribution, documentation, interpretation, display, care, storage, access, use, or disposition of collections. Shared stewardship arrangements must be documented in a written agreement approved by the appropriate Under Secretary in consultation with the OGC and NCP.
- 2) Collecting units may deaccession and return collections in appropriate circumstances, based on ethical considerations. Collecting units must establish authority and evaluation criteria and assign responsibility to approve, document, and process such deaccessions and returns, including transfer of associated collections information, within the unit's collections management policy. Before collections may be deaccessioned and returned for ethical reasons, collecting units must consult with the appropriate Under Secretary, the NCP, and the OGC and must obtain all approvals for deaccessioning and returns required under Section 8 of this directive. Before a collecting unit can deny a claimant's request for return of a collection for ethical reasons, the collecting unit must consult with the appropriate Under Secretary.
- 3) Collecting units must establish and implement readily accessible processes for descendants, communities, and other parties with claims to request shared stewardship or return of collections based on ethical considerations. These processes shall prioritize transparency, respectful engagement, meaningful consultation, and prompt responses to requests.

16.2. Native American and Native Hawaiian Human Remains and Objects

The 1989 [National Museum of the American Indian \(NMAI\) Act](#), 20 U.S.C. §80q et seq., as amended in 1996, requires the Smithsonian to return culturally affiliated human remains, funerary objects, sacred objects, and objects of cultural patrimony to Indian tribes and Native Hawaiian organizations. Under the NMAI Act, the Smithsonian is required to prepare inventories and summaries about such objects, and to disseminate the information to and consult with Indian tribes and Native Hawaiian organizations about human remains and other cultural objects that may be eligible for repatriation under the NMAI Act.

The NMAI Act established the Smithsonian Institution Repatriation Review Committee, which serves as an advisory body to the Secretary or the Secretary's designee on the application of the NMAI Act with respect to the collections of the National Museum of Natural History. Additionally, the NMAI Act also established the NMAI Board of Trustees, which, subject to the general policies of the Board of Regents, has sole authority over certain collections decisions, including final resolution of repatriation claims submitted to the NMAI.

In addition to the applicable requirements of the NMAI Act, Smithsonian collecting units with Native American and Native Hawaiian collections should be aware of and sensitive to other

issues that arise out of cultural concerns of Native American Tribes, Native Hawaiian organizations named in the NMAI Act, and other Native American and Native Hawaiian groups. Such concerns may relate to appropriate standards for the use, management, and care of culturally affiliated human remains and cultural objects and protections for interests in the intellectual content associated with these objects. Collecting units are encouraged to consult with Native American Tribes, Native Hawaiian organizations named in the NMAI Act and other Native American and Native Hawaiian groups associated with the human remains and objects in their collections, and to take their interests into account in establishing policies for the use, management, and care of these collections, provided that such policies are consistent with applicable law and the Smithsonian's responsibilities for the care and management of its collections.

The Smithsonian adheres to the following policies regarding Native American and Native Hawaiian human remains and objects:

- 1) Smithsonian repatriation of Native American and Native Hawaiian human remains and objects is governed by the requirements set forth in the NMAI Act, 20 U.S.C. § 80q, as amended.
- 2) Final repatriation decisions are made by the Secretary or the Secretary's designee, except for the collections of the National Museum of the American Indian. In accordance with the NMAI Act, the NMAI Board of Trustees has sole authority to dispose of any part of NMAI collections, which includes repatriation. All NMAI repatriation decisions are subject to the general policies of the Board of Regents.
- 3) Any Native American or Native Hawaiian collections whose return or repatriation is not required by the NMAI Act shall be managed in accordance with this directive. Decisions to return collection objects outside the scope of the NMAI Act (e.g., to indigenous people in other countries) will be managed in accordance with this directive and unit collections management policies.

16.3. Cultural Property

The Smithsonian Board of Regents first adopted a policy on the acquisition of art, antiquities, and other specimens in 1973. Updated and revised by the Board of Regents on April 13, 2015, the [Smithsonian Institution Policy on Acquisition of Art, Antiquities, Archaeological and Ethnographic Material, and Historic Objects](#) reaffirms the Smithsonian's support for efforts of local, state, national, and international authorities to protect art, antiquities, national treasures, and ethnographic material from destructive exploitation. The policy establishes rules for the acquisition and borrowing of art, antiquities, archaeological and ethnographic material, and historic objects.

The Smithsonian repudiates the illicit traffic in art and cultural objects that contributes to the despoliation of museums and monuments and the irreparable loss to science and humanity of archeological remains. Objects and specimens which have been stolen, unscientifically gathered or excavated, unethically acquired, or unlawfully exported from their country of origin should not be made part of Smithsonian collections.

The Smithsonian adheres to the following policies regarding cultural property:

- 1) All Smithsonian collections management policies and activities will comply with the [Smithsonian Institution Policy on Acquisition of Art, Antiquities, Archaeological and Ethnographic Material, and Historic Objects](#).
- 2) Before acquiring or borrowing a collection item, the Smithsonian must conduct due diligence sufficient to ascertain, from the circumstances surrounding the transaction or knowledge of the item's provenance, that the collection item was not stolen or wrongfully converted and is not illegally present in the United States.
- 3) Before acquiring or borrowing a collection item, the Smithsonian must ascertain through provenance research that the collection item was not unethically acquired from its source or unscientifically excavated.
- 4) Before acquiring or borrowing a collection item, the Smithsonian must ascertain through provenance research that the collection item was outside its country of probable modern discovery before November 17, 1970, or was legally exported from its country of modern discovery and lawfully imported into the United States after November 17, 1970. For collection items lacking a complete documented provenance history, the [Smithsonian Institution Policy on Acquisition of Art, Antiquities, Archaeological and Ethnographic Material, and Historic Objects](#) provides guidelines, based on professional museum standards, for collecting unit directors to make an informed decision as to whether the collection item can be acquired or borrowed.
- 5) The provenance of collection items shall be a matter of public record.

16.4. Biological Material

The Smithsonian has long been a leader in the effort to halt the continuing degradation of the world's natural history and environmental resources. Smithsonian research and collecting activities must be undertaken with sensitivity to the continued protection of biological diversity and in compliance with applicable federal, state, local, tribal, and international laws, treaties, regulations, and conventions protecting animal and plant species, especially those that are threatened or endangered.

Field studies and collecting of biological material should be preceded by disclosure and consultation with the proper authorities and interested scientific institutions in the location of the fieldwork. Field activities must be conducted lawfully, support educational and scientific purposes, and not cause undue detriment to the biodiversity and ecological conditions in the location or region of the activity.

Biological material (e.g., ivory, feathers, blood, and bone) embodied in art or other objects or acquisitions must comply with all applicable laws relating to import, export, and possession of the embedded biological material.

The Smithsonian adheres to the following policies regarding biological material:

- 1) Biological material may be acquired by or on behalf of the Smithsonian through field collecting only when such collecting is legally authorized in advance; the biological

material is obtained solely for the purposes of scientific research or conservation, to add to the Smithsonian collections, or for other educational purposes; and the Smithsonian's collecting activities will not cause undue detriment to the biodiversity and ecological conditions in the area of the activity.

- 2) Nothing in this directive shall prevent collecting units, when acquiring international biological material, from also considering international conventions governing the transfer of biological materials even if such conventions are not legally applicable to the Smithsonian.
- 3) The Smithsonian name may not be used to justify or support permit applications for activities that have not been authorized by or on behalf of the Smithsonian in accordance with this directive and unit collections management policies.
- 4) The Smithsonian may acquire or borrow biological material collected or obtained by others, including when embodied in art and other objects, only when consistent with established collecting unit criteria for the transaction and applicable international, national, state, local, and tribal laws.
- 5) Biological material in Smithsonian collections or in its custody will be managed in accordance with all applicable legal requirements.

16.5. Unlawful Appropriation of Objects During the Nazi Era

Between 1933 and 1945, the Nazi regime and its collaborators orchestrated a system of confiscation, coercive transfer, looting, and destruction of cultural property and artwork throughout Europe on an unprecedented scale. Millions of objects were unlawfully appropriated from their rightful owners, including private citizens, victims of the Holocaust, public and private museums and galleries, and religious, educational, and other institutions. Some of these objects were ultimately transferred, in good faith and without knowledge of their prior unlawful appropriation, through the legitimate market and may have been acquired by museums. Postwar restitution efforts to return unlawfully seized objects to their rightful owners did not lead to complete and comprehensive restoration.

Guidance issued by the AAM and the AAMD concerning objects that may have been unlawfully appropriated during the Nazi era recommends museums identify objects in their collections that were created before 1946, acquired by the museum after 1932, underwent changes in ownership during the Nazi era, and were or may reasonably be thought to have been in continental Europe between 1933 and 1945. The Smithsonian is committed to implementing the AAM and AAMD guidelines by researching, identifying, and making public any objects that fall within their scope.

The Smithsonian adheres to the following policies regarding unlawful appropriation of objects during the Nazi era:

- 1) The Smithsonian shall not knowingly acquire collection items unlawfully appropriated during the Nazi era without subsequent restitution.

- 2) If the Smithsonian has in good faith acquired a collection item subsequently determined to have been unlawfully appropriated during the Nazi era without restitution, the Smithsonian will take prudent and necessary steps to resolve the status of the collection item.
- 3) The Smithsonian shall apply the applicable provisions of the AAM [Guidelines Concerning the Unlawful Appropriation of Objects During the Nazi Era](#) and the AAMD [Report on the Task Force on the Spoliation of Art during the Nazi/World War II Era \(1933–1945\)](#) to its collection management activities.

17. SMITHSONIAN COLLECTING UNIT REQUIREMENTS

Smithsonian collecting units must adhere to the policies of this directive, including the following policies regarding unit collections management.

A well-managed collection is governed by specific documents that guide collections-related decisions based on strategic planning goals and priorities. In accordance with this directive, each Smithsonian collecting unit must develop, implement, and maintain the following.

17.1 Collections Stewardship Plans

A collections stewardship plan provides an intellectual framework for collections that establishes well-defined goals and priorities to guide collections-related decisions regarding acquisition, deaccessioning, resource allocation, institutional and community partnerships, and other activities related to the growth and refinement of collections.

Each collecting unit must develop, implement, and adhere to an authorized, up-to-date collections stewardship plan to guide collections-related activities that are consistent with strategic planning objectives.

Collections stewardship plans should be reviewed and updated every five years to align with unit strategic planning and require written approval from the collecting unit director and review by the NCP and the appropriate Under Secretary.

17.2 Unit Digitization Plans

Unit digitization plans support the Smithsonian's commitment to promote access to collections and collections information in databases and online platforms to maximize the application of networked technologies, implement professional documentation standards, and share collections information through collaborations among collecting units and with other cultural, educational, and research institutions.

In accordance with this directive and [SD 610, Digitization and Digital Asset Management Policy](#), each collecting unit must develop, implement, and maintain an authorized, up-to-date unit digitization plan that establishes unit-specific goals, priorities, and standards for the digitization of its collections. Unit digitization plans should be reviewed and updated every three years.

17.3 Unit Collections Management Policies

Collections management policies establish general principles and standards to govern the collections-related activities and operations of a collecting unit to achieve its mission, programmatic goals and objectives, and responsibilities regarding collections. Unit collections management policies define areas of authority and responsibility for collections, establish decision-making criteria, and provide guidance on collections management activities that carry out the unit's legal, ethical, and professional obligations for collections in its care.

Each collecting unit designs policies specifically tailored to the nature, scope, character, and intended purpose of its collections. Collections are defined by each collecting unit within their collections management policy.

In accordance with this directive, each Smithsonian collecting unit must develop, implement, and adhere to an authorized, up-to-date collections management policy consistent with the policies established by this directive.

The Smithsonian is increasingly acquiring diverse types of collections, collected for vastly different purposes and uses, and composed of various kinds of materials, which are most appropriately stewarded in accordance with discipline-specific standards of management and care. These discipline-specific standards may in some cases deviate from the standards outlined in this directive. Therefore, the NCP may approve, in consultation with the collecting unit director and the appropriate Under Secretary, to exempt specific types of collections from specific provisions of SD 600. Such exemptions must be specified in the collecting unit's collections management policy, and the unit's policy must specify the national or international discipline-specific standards which will instead apply to the type of collection granted the exemption.

Unit collections management policies must be reviewed every five years and, if necessary, revised and reauthorized as appropriate. Revised collections management policies must be approved by the collecting unit director, the NCP, the OGC, the appropriate Under Secretary, and the Secretary. If a collecting unit reviews its collections management policy and chooses not to revise its policy, the unit director must notify the NCP and appropriate Under Secretary.

In certain circumstances, collecting units may make minor amendments to their existing collections management policy in advance of a full review and revision. Written approval is required from the collecting unit director, the NCP, the OGC, and the appropriate Under Secretary. Any approved amendments are addressed through the formal review and approval process during the unit's next periodic review and revision of its collections management policy.

Certain collecting units may have varying levels of authority that limit the unit from adhering to certain policy requirements. Collecting units that do not have delegated authority to conduct specific transactional activities must clearly articulate such restrictions in the unit's policy.

Each unit collections management policy must include the following components:

- 1) **Introductory Statements.** Each collecting unit must clearly articulate the mission, strategic priorities, programmatic goals, and role of the collecting unit within the larger Smithsonian community in the following introductory statements:
 - Statement of purpose;
 - Statement of authority;
 - Definition of collections;
 - Collections scope; and
 - Description of applicable collections management activities.

- 2) **Acquisition and Accessioning.** Collecting units must include the following policy components regarding the acquisition and accession of collections. Each unit must:
 - establish authority and assign responsibility to approve, document, and process acquisitions and accessions;
 - develop and implement formalized evaluation criteria for potential acquisitions;
 - establish appropriate methods of acquisition;
 - ensure the documentation of legal title and provenance for all collection items acquired; and
 - ensure the creation and maintenance of permanent records for acquisitions and accessioning.

- 3) **Deaccessioning and Disposal.** Collecting units must include the following policy components regarding deaccession and disposal of collections. Each unit must:
 - establish authority and assign responsibility to approve, document, and process deaccessions and disposals;
 - develop and implement formalized evaluation criteria for deaccessioning and disposal decisions;
 - establish appropriate methods of disposal;
 - develop and implement disposal plans at the time of deaccession;
 - develop policies and procedures, in accordance with their professional membership, for the appropriate use of proceeds realized from the disposal of deaccessioned items — the acquisition of additional collection items or the direct care of existing collections; and
 - stipulate authority and approval for the disposal of non-accessioned collections.

- 4) **Preservation.** Collecting units must include the following policy components regarding the preservation and care of collections. Each unit must:

- establish authority and assign responsibility for the physical care, storage, handling, preventive conservation, conservation treatment, restoration, pest management, preservation environment, sustainability, and maintenance of collections;
- develop, implement, and adhere to established preservation policies, standards, and procedures consistent with the mission of the unit and the nature, purpose, and intended use of its collections;
- ensure collections and their associated information are cared for and maintained in conditions that preserve and extend their physical and intellectual integrity for use in exhibitions, research, and education; and
- ensure that all collections acquired, borrowed, and in the collecting unit's custody receive the appropriate level of care.

5) **Collections Information.** Collecting units must include the following policy components regarding collections information. Each unit must:

- establish authority and assign responsibility for the development, management, preservation, and maintenance of collections information;
- establish authority and assign responsibility for the implementation and management of collections information systems;
- establish authority and assign responsibility for the development and implementation of a unit digitization plan that defines the unit's digitization program and its objectives and priorities for collections digitization;
- establish documentation standards to ensure the quality, integrity, and proper maintenance, management, and dissemination of collections information;
- ensure the maintenance of collections information on the cultural, historical, scientific, or aesthetic significance, legal status, provenance, and the use and management of its collections and collections in the unit's custody; and
- promote the widest dissemination of collections information consistent with unit stewardship responsibilities.

6) **Inventory.** Collecting units must include the following policy components regarding the inventory of collections. Each unit must:

- establish and assign responsibility for developing and implementing inventory processes and standards, and a written inventory plan appropriate to the purpose, character, and size of the collections in its care and staff resources;
- establish authority and assign responsibility for conducting, supervising, approving, and reporting on inventories and reconciliation of collection records; and

- ensure adequate separation of duties and other internal controls to minimize the possible unauthorized removal of collection items and corresponding records.

7) **Risk Management, Safety, and Security.** Collecting units must include the following policy components regarding risk management, safety, and security of collections. Each unit must:

- establish authority and assign responsibility for unit risk management, safety, and security activities to identify, eliminate, or mitigate conditions which may create the potential for damage or loss to collections, risks of personal injury, or legal, reputational, or financial liability;
- establish authority and assign responsibility for the development, implementation, and coordination of the unit's emergency management plan and program for its facilities housing collections;
- develop policies and procedures for reporting and documenting damage, loss, or possible theft of collections in its custody and on loan;
- make reasonable efforts to identify, document, and promote the appropriate communication of potential collections-based hazards in accordance with this directive, [SD 419](#), and applicable chapters of the [Smithsonian Institution Safety Manual](#); and
- ensure collections are maintained in controlled areas which are adequately protected to reduce exposure to risks such as fire, theft, vandalism, and natural disasters.

8) **Access.** Collecting units must include the following policy components regarding access to collections. Each unit must:

- establish authority and assign responsibility to control, monitor, approve, document, and provide access to physical collections, digital collections, and collections information consistent with the specific type and purpose of the unit's collections and applicable access restrictions;
- establish policies, criteria, and procedures for permitting responsible access to collections, collections storage, and collections information consistent with the unit's mission and the purpose and intended use of the collections; and
- make access policy statements available to the public.

9) **Loans.** Collecting units must include the following policy components regarding lending and borrowing collections. Each unit must:

- establish authority and assign responsibility to approve, process, document, and monitor loans, including, where appropriate, temporary custody;

- establish policies, criteria, and procedures for lending and borrowing collections; and
- apply the provisions of [SD 603](#), the [Smithsonian Unit-to-Unit Object Loan Guidelines](#), and the AAM [Guidelines for Exhibiting Borrowed Objects](#) in unit borrowing activities.

10) **Intellectual Property Rights.** Collecting units must adhere to the following policy requirements regarding intellectual property rights. Each unit must:

- establish authorities to approve permissible use of collections information and images, and assign responsibility for rights management;
- establish policies and procedures to ascertain whether collection items or proposed acquisitions are encumbered by intellectual property rights or other restrictions, and document any [SD 609](#) restrictions for collection items in collection records to determine, if possible, what steps are required to obtain any rights necessary for the intended use of the item;
- establish policies and procedures for handling and documenting outside requests and permissions to publish or reproduce collections information and images in accordance with [SD 609](#);
- determine permissible uses of collections information, metadata, and images to ensure consistency with the mission of the Smithsonian and the collecting unit; and
- ensure that collection records are consulted for possible restrictions or prohibitions to determine permissible image use and reproduction by the Smithsonian and others in all media formats, such as print, digital, audio, video, and the Internet.

11) **Specific Legal and Ethical Issues.** Each collecting unit must determine if it acquires, holds, or manages any collections that fall within the scope of the following and incorporate the appropriate legal and ethical standards in its collections management policy:

Shared Stewardship and Ethical Returns

Each collecting unit must establish authority and evaluation criteria and assign responsibility to approve, document, and implement shared stewardship arrangements and ethical returns in appropriate circumstances, based on ethical considerations. Each collecting unit must further establish readily accessible, transparent, and consultative processes for descendants, communities, and other parties with claims to request shared stewardship or return of collections based on ethical considerations.

Native American and Native Hawaiian Human Remains and Objects

Each collecting unit must determine if its collections include Native American or Native Hawaiian materials to which the requirements of the National Museum of the American Indian Act (NMAI Act), as amended, may be applicable. Any collecting unit with Native American or Native Hawaiian collections must:

- develop written policies and procedures consistent with the legal requirements of the NMAI Act;
- assign responsibility to complete inventories and summaries, and assess the cultural affiliation of the collections in accordance with the provisions of the NMAI Act;
- establish authority and assign responsibility to review, evaluate, document, and process repatriation requests and returns; and
- establish authority and assign responsibility to review proposed acquisitions to determine the applicability of the NMAI Act.

Cultural Property

Each collecting unit must establish authority and assign responsibility for implementing and ensuring compliance with the [Smithsonian Institution Policy on Acquisition of Art, Antiquities, Archaeological and Ethnographic Material, and Historic Objects](#), and other applicable laws and professional standards regarding the acquisition, borrowing, and management of cultural property.

Biological Material

Each collecting unit with responsibility for biological material must establish authority and assign responsibility to approve, document, and ensure compliance with legal requirements for collections transactions involving biological material.

Unlawful Appropriation of Objects During the Nazi Era

Each collecting unit must establish authority and assign responsibility for implementing and ensuring compliance with the Smithsonian policy on Nazi-appropriated objects and the applicable professional guidelines issued by AAM and AAMD.

- 12) **Ethics.** Each collecting unit must establish policies and procedures for implementing the collections-specific requirements of [SD 103](#) and other standards of professional conduct, including personal collecting, appraisals, and authentication.
- 13) **Financial Accounting for Collections.** Each collecting unit must include a statement on financial accounting for collections in compliance with the Smithsonian's policy regarding the non-capitalization of collections.
- 14) **Monitoring and Revision of Unit Collections Management Policies.** Each collecting unit must establish authority and assign responsibility for monitoring and

reporting on the implementation of SD 600 and the unit collections management policy. Each collecting unit must establish authority and assign responsibility for the development, revision, and implementation of the unit's collections management policy and establish procedures for the periodic review, and, if necessary, revise and obtain reauthorization of the unit's policy. Unit collections management policies must be reviewed every five years to ensure the policy is up to date.

18. EXCEPTIONS

A collecting unit may seek an exception to the policies set forth in this directive or its collections management policy if the application of such a policy directly hinders the unit's ability to achieve the mission objectives or programmatic goals of the Smithsonian. Requests for any such exception must be submitted in writing by the collecting unit director for approval by the NCP, the OGC, and the appropriate Under Secretary.

SUPERSEDES:	SD 600, issued on October 26, 2001.
INQUIRIES:	National Collections Program (NCP).
RETENTION:	Indefinite. Subject to review for currency 36 months from date of issue.
