

# Collections Management Policy

PENNMUSEUM

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# I. Introduction

## A. Statement of Purpose

This Collections Management Policy governs all aspects related to the development, management, preservation, and use of the Penn Museum's collections. The policy provides a framework of professional standards to establish guidelines for managing the collections.

The Collections Management Policy is a comprehensive written statement that:

- Sets forth the mission of the Penn Museum,
- Explains how this mission is pursued through collection-related activities,
- Articulates the organization's professional standards regarding objects in its care,
- Serves as a guide to staff and volunteers in carrying out their collection related responsibilities, and
- Provides the public with information about what objects and information the organization collects and preserves and how the organization performs these functions.

This policy was developed and drafted by the staff of the Penn Museum with the assistance of the Conservation Center for Art and Historic Artifacts (CCAHA) as part of an initiative funded by the Institute of Museum and Library Sciences.

## B. Process of Establishing Policy

This Collections Management Policy is a working document. Any errors, omissions, or other necessary changes will be identified and updated by the Penn Museum's staff in a timely manner.

All collections-related policies are written and peer-reviewed by the Collections Committee and approved by the Executive Team. The final draft was approved and adopted by the Executive Team.

This policy was first written in 2023 by the Penn Museum Collections Committee.

## C. Statement of Authority

The Penn Museum is organized as a private, non-profit, educational organization and is governed by the Trustees of the University of Pennsylvania. The collection is owned by the Trustees of the University of Pennsylvania.

The governing authority's role in managing the collection is to ensure that the Penn Museum is adhering to applicable laws and University policies, and to provide operational oversight for the Penn Museum. The day-to-day management of the Penn Museum is delegated to the Williams Director, who bears the ultimate responsibility for implementation of this Collections Management Policy.

## D. Permanent Collections Charge

The Penn Museum's permanent collections are overseen by the Director of Collections. The Director of Collections then delegates collections stewardship and management tasks to members of the Collections Committee.

The Collections Committee is chaired by the Director of Collections and consists of Conservators, Keepers, Registrars, and Special Projects. The Committee is available to provide advisement to the Executive Team on the oversight of the collection and all matters pertaining to collections care and management. Moreover, this Committee has the mandate to be conversant with current legal, ethical, and professional standards regarding collections management.

## E. Code of Ethics

The Penn Museum recognizes the code of ethics of the following Organizations:

- American Alliance of Museums (AAM)
- Association of Academic Museums and Galleries (AAMG)
- American Institute for Conservation (AIC)
- Association of Art Museum Directors (AAMD)
- Code of Ethics and Professional Practices for Collections Professionals (CS-AAM/ARCS)
- International Council of Museums (ICOM)
- Society of American Archivists (SAA)

In general principle, the Penn Museum affirms and supports the contents of these codes.

The management of this collection additionally adheres to the Penn Museum Code of Ethics, as well as the University of Pennsylvania's Principles for Responsible Conduct.

## F. Review and Revision

This policy shall be reviewed and updated by the Collections Committee and the Executive Team every three years.

The policy will be reviewed outside of the regularly scheduled reviews as deemed necessary by the Collections Committee or when there is an organizational change that necessitates a review.

## G. Public Disclosure

Once approved by the Executive Team, copies of this Collection Management Policy will be provided to the Trustees of the University of Pennsylvania and appropriate staff of the Penn Museum. The policy will be made public through posting the policy on the organization's public webpage.

## II. Mission and Collections

### A. Institutional Mission

The mission of the Penn Museum is to be a center for inquiry and the ongoing exploration of humanity for our University of Pennsylvania, regional, national, and global communities, following ethical standards and practices.

We do this by:

- Conducting research
- Stewarding collections
- Creating learning opportunities
- Contextualizing and telling stories, and
- Creating experiences for people to contribute to and engage with these stories.

### B. Description and Scope of Collection

The Museum's collection is one of the largest and earliest university-assembled collections in the country, and the only one of its kind in the Philadelphia area, to document humanity around the world. The Museum's collection provides a definitive repository of objects associated with the geographic regions of Africa, Asia, the Americas, Egypt, Europe, the Mediterranean, the Near East, and Oceania, and specimens relevant to the discipline of Biological Anthropology. The collection delineates the achievements of humankind across time and throughout the world. The Museum strives to work collaboratively and respectfully with descendant communities to care for and steward the collections.

### C. Purpose of the Collection

The Penn Museum collection is acquired, preserved, researched, and interpreted to further the museum's mission to be a center for inquiry and the ongoing exploration of humanity for our University of Pennsylvania, regional, national, and global communities, following ethical standards and practices.

The Museum was established by the University of Pennsylvania to steward materials collected through university-sponsored excavations and expeditions. Additional collection materials are acquired by donation, commission, or purchase.

Artifacts are primarily acquired for preservation and research-supported interpretation, although some may be designated for educational hands-on use.

Collections will continue to be exhibited and interpreted to serve the Museum's mission. Collections should not be viewed as a separate and discrete function of the Museum, but as an integral and integrated aspect of the Penn Museum's core values.



### III. Acquisitions and Accessions

#### A. Introduction and Methods of Acquisition

The Penn Museum is empowered by their governing authority, the Trustees of the University of Pennsylvania, to acquire items for the collections by gift, bequest, exchange, transfer, purchase, and field work.

Guidelines for acquisition of objects through donation, bequest, exchange, transfer, purchase, and field work are outlined in the Acquisitions Policy and Procedures.

"Acquisition" is the procurement of an object for the collection by the Penn Museum. "Accessioning" is the process by which the title to an object passes to the Trustees of the University of Pennsylvania, establishing legal custody and ownership and providing information on how the Penn Museum acquired the object.

#### B. Authority

The Acquisitions Committee is responsible for initiating the acquisition process in accordance with the criteria established in this document.

The relevant Curatorial Section shall provide a written recommendation to the Acquisitions Committee for accessioning objects. The Acquisitions Committee meets on a bi-annual basis to review each proposed acquisition and make recommendations to the Williams Director. The Williams Director then makes the final decision to proceed with an acquisition or to decline the acquisition.

Donations to the Penn Museum are accepted upon the approval of the Williams Director.

All purchased additions to the Penn Museum with a monetary value of \$10,000.00 or more must be approved by the Board of Advisors. Guidelines for the consideration and approval of purchases are outlined in the Acquisitions Policy and Procedures.

#### C. Criteria for Collection Acquisition

The Penn Museum only acquires an object for the collection with the intention of retaining it for the long term. No objects or documents shall be accepted into the permanent collection of the Penn Museum with the sole purpose of being deaccessioned and sold. Before any object is acquired by any means the following

criteria must be met:

### 1. Collecting Scope

The Penn Museum will only accept acquisitions that fall within the scope of its collections (as defined in this policy in Section II.B. Purpose, Scope and Use of the Collection) and collection criteria as defined in additional organization policies.

### 2. Format

The primary formats collected include archaeological artifacts, anthropological artifacts, and archival collections.

### 3. Title

All acquisitions must be accompanied by clear title that has been presented by the donor, seller, or the donor's authorized agent. When proposing an object for acquisition, clear title must be established, either via the donor or via permits for field work.

The Museum shall ask for the donor to transfer all intellectual property associated with the donation that the donor may own, such as trademarks, copyrights, licenses, literary rights, artistic rights, or patents. At its discretion, the Museum may request documentation of an object's provenance.

### 4. Condition

The object is in good condition (or can be stabilized or conserved or, in the case of born-digital materials, transferred to another medium).

The object is in a condition to be exhibited or, if for study, sufficiently stable to permit that activity.

The object is not immediately hazardous to people or property.

If in need of immediate conservation, the object can be conserved within the available resources of the Penn Museum or is accompanied by a monetary donation for its conservation.

Exceptionally large or damaged objects, or any object that cannot immediately be made available for research due to its size, poor state of preservation, physical instability, risk to staff or other objects, etc., will be evaluated on a case-by-case basis by the relevant Curatorial Section, the Conservation Department, and, as needed, the Acquisitions Committee. Provisions required for the care and conservation of the object will be taken into account before accepting the object(s).

## 5. Penn Museum's Resources

The Penn Museum may only accept acquisitions if the resources necessary to care for and appropriately steward the object are available. This includes the costs of transporting, cataloging, rehousing, and conserving the object. If an object is not offered as a gift or bequest, Penn Museum must be able to afford to purchase the object using reserve funds.

No object shall be acquired for the collection if the Penn Museum does not have the resources to secure, steward, store, and/or exhibit the object safely.

## 6. Duplicates

In general, the Penn Museum will acquire duplicates of objects or materials already in the collection only if they meet the circumstances outlined in the Penn Museum's Scope of Collections.

## 7. Legal and Ethical Considerations

The object has not been illegally excavated or illegally imported into the United States or illegally collected within the United States. The Penn Museum has done due diligence to confirm the object's legal status to the best of its ability prior to acquisition.

The object meets the guidelines set forth in the Penn Museum's Code of Ethics and Human Remains Policy.

## 8. Conditional Acquisitions

Gifts and bequests should be accepted only if they conform to the stated policies of the Penn Museum. Objects that are subject to the imposition of special and restricting conditions may not be accepted if the conditions are contrary to the interests of the Penn Museum.

- All gifts should be unrestricted, with no commitment made to the donor to retain them in perpetuity or to exhibit them unless agreed upon by the Penn Museum and the donor. Conditions regarding exhibiting objects should be avoided except under the most unusual circumstances. If such conditions are accepted, these conditions should apply only to a limited, specified period of time.
- The Penn Museum will not accept collections donated with the condition that the entire collection be accessioned. The Penn Museum has the right to choose, within a proposed donation, which objects they wish to keep. For manuscript and archival collections, the standard practice of accepting an entire collection and selecting materials for disposal as the collection is processed will be followed.
- The Penn Museum will not accept materials that are restricted from public access in perpetuity.

## 9. The Education Collection

The Penn Museum may accept donations of non-collection reference materials, equipment, supplies, and objects given to support and further its educational objectives. Objects in the Education Collection are non-accessioned and are intended for use by students and visitors. Objects may be added to the Education Collection through purchase or donation. All acquisitions of Education Collection materials will adhere to the Acquisitions Policy and Procedures.

### D. Acquisition Terms and Restrictions

The Penn Museum will not pay for a monetary appraisal of the proposed gift for a donor, nor recommend an appraiser. A board member, employee, or any consultant or volunteer employed by or associated with the Penn Museum may not appraise a potential gift for a donor.

Objects that are intended to be sold by the museum will not be accepted and formally accessioned.

No person who is a staff member, board member, or volunteer, or who is involved in the policy or management of the Penn Museum, may compete with the Penn Museum for objects or may take advantage of privileged information which has been received. Should a conflict of interest develop between the needs of the individual and the Penn Museum, the needs of the Penn Museum will prevail. This is addressed in the Penn Museum's Code of Ethics.

Guidelines for acknowledging gifts in records, on object labels, or in use of the objects are outlined in the deed of gift.

#### E. Documentation of Acquisitions and Accessions

The complete procedure of acquiring and accessioning any object will be recorded. All documents relating to the object, including the signed Deed of Gift, will be deposited in the relevant collection files. Collection-related records are held and maintained by the Registrar's Office and by Archives.

All pending acquisitions are documented with a Temporary Custody Receipt, to be signed by a museum representative and the donor. Each object is assigned a temporary tracking number and will be recorded in the collections database. Objects awaiting review will be stored in a temporary storage location, unless otherwise noted on their catalogue record.

Accession procedures are outlined in the Acquisitions Policy and Procedures. The Registrar's Office is responsible for ensuring all acquisitions are properly recorded and accessioned.

## IV. Deaccessions and Disposals

Deaccessioning is the process of permanently removing accessioned collection objects and materials from the Penn Museum's permanent collections. The sole purpose of deaccessioning any object or archival collection within the Penn Museum is to refine and strengthen the overall collections.

Deaccessioning is an important collections management tool that is employed by collecting institutions around the world for a variety of reasons. As the Penn Museum's mission, goals, and vision shift, it is recognized that some objects that no longer align with long-term organizational needs, or that cannot be properly housed, conserved, and/or exhibited, may be considered for deaccession or disposal.

Because deaccessioning can adversely affect an institution's collection, reputation, and ability to fundraise, all objects proposed for deaccessioning from the Penn Museum are subjected to a thorough review. Procedures for the deaccession or disposal of materials are as rigorous as those for accessioning and are governed by the same basic principles. The decision to dispose of materials is made only after scrupulous consideration of the public interest and the needs of researchers; the process of deaccessioning and disposal is carried out in as open and public a manner as possible.

The Penn Museum will carefully assess all materials before accepting them to lessen the likelihood of deaccessioning. Nevertheless, there are valid reasons why materials in collections may be deaccessioned.

Archival processing includes selection and disposal of material on a regular basis. Material discarded as a part of this normal process is not subject to the same rigor of deaccession procedures as accessioned collection objects and materials.

Guidelines and standards have been set by professional organizations to promote clear, consistent, and ethical deaccessioning practices. The following policy for deaccessioning of materials from the Penn Museum is in accordance with the standards established by:

- American Association of Museums (AAM)
- Association of Academic Museums and Galleries (AAMG)
- Association of Art Museum Directors (AAMD)
- Society of American Archivists (SAA)

Considerations regarding deaccessioning are subject to the terms of acquisition, local regulations, and state and federal laws.

## A. Authority

Deaccessions must be approved by the Williams Director. For deaccessions with an aggregate value greater than \$100,000, the Williams Director must also consult with the Museum's Board of Advisors and the Office of the Provost, which may in turn refer the proposed deaccessions to the Office of the President and the Trustees of the University of Pennsylvania for final approval. Additional deaccessioning guidelines are documented in detail in the Museum's Deaccession Policy and Procedures.

The deaccessioning process begins with a request to the Acquisitions Committee from the relevant Curatorial Section stating the reason for the proposed deaccession. The Acquisitions Committee meets on a bi-annual basis and makes recommendations to the Williams Director.

## B. Criteria for Deaccessioning

Because the Penn Museum is aware of its role as a steward of the collection for the benefit of the public, it acquires only objects that it intends to retain for the long term and not with the intention of disposing.

To be considered for deaccessioning, an object must fulfill the following requirements:

1. Be free from donor-mandated restrictions;
2. Be fully and legally owned by the Trustees of the University of Pennsylvania; and
3. Meet at least one of the following criteria:
  - The object or material does not meet the current criteria for purpose and scope of collections and hence does not support the organization's mission.
  - The object or material is unduly difficult or impossible to care for or store properly.
  - The object has been extensively damaged or presents a risk to other materials in the collections and/or to the individuals working therein and cannot be restored without compromising its integrity.
  - The object or material was acquired illegally or unethically, is requested for repatriation, or is shown to be the rightful property of another person or entity.

- The organization is unable to preserve or manage the object or material properly.

Human Remains and Funerary Objects are approved for repatriation to Native Americans or Native Hawaiians under the guidelines of H.R. 5237 (Public Law 101 601) as signed into law on November 16, 1990 (NAGPRA). Additionally, Sacred Objects and Objects of Cultural Patrimony as defined by NAGPRA are approved for repatriation by the Trustees of the University of Pennsylvania.

### C. Restrictions and Conditions on Deaccessioning

When considering deaccessioning, the Penn Museum will carefully weigh the interests of the public for which it holds the collections in trust, the interests of the scholarly and cultural communities, and the Penn Museum's mission.

The Penn Museum will consider any legal restrictions, the necessity for possession of valid title, and the donor's intent in the broadest sense. Mandatory restrictions on disposition which accompanied a donation will be observed unless it can be shown clearly by appropriate legal procedures that adherence to them is impossible or substantially detrimental to the Penn Museum. When statements of donor's preferences accompany an acquisition, any departure from them will be carefully considered and negotiated with the donor or the donor's heirs or settled by appropriate legal procedures.

Under no circumstances will a deaccessioned object be given to, or otherwise placed in, the possession of a University of Pennsylvania staff member, volunteer, board member, or any representative or immediate family member of the aforementioned.

### D. Methods of Disposal

The Penn Museum may dispose of a deaccessioned object by transfer (to a reference collection or other department), gift (to a non-profit institution with a similar mission), exchange, sale, or witnessed destruction when it is warranted.

When recommending deaccessioning, all acceptable means of disposal must be considered. The method will be determined on a case-by-case basis for each deaccessioned object. Deaccessioned objects are usually disposed of through one of the following means:



- Transfer: Objects or archival material may be transferred to a reference collection or other department.
- Gift: Due consideration should be given to the cultural collecting community in general when disposing of objects. Objects should first be offered to a non-profit institution with a mission similar to that of the Penn Museum, and then to other non-profit institutions. The object's provenance will clearly be indicated. In any instance where title is transferred to another entity, the Penn Museum will disclose to the potential new owner or intermediary agent any action, such as the retention of a photocopy of the material, which may affect the monetary or scholarly value of the material.
- Exchange: Objects should be exchanged with another museum, cultural institution, or nonprofit organization for the purpose of obtaining other objects needed for the collection.
- Sold: Objects should be offered through a public sale by a disinterested, reputable third party to avoid conflicts of interest or the appearance of conflicts of interest. Proceeds from the deaccession of objects must only be used for the direct care of the collection or for the purchase of new acquisitions. Proceeds from any such sale will be held in a financial account restricted to these purposes.
  - Direct care means the direct costs associated with the storage or preservation of museum collections. Such direct costs include for example those for (i) conservation treatments (including packing and transportation for such conservation) and (ii) materials required for storage of all classifications of museum collections, such as, storage mounts, storage boxes, acid-free paper, ethafoam, Volara, folders, frames, and digital media migration. Funds received from the disposal of a deaccessioned object or collection shall not be used for operations or capital expenses except as provided above. Direct care does not include (a) salaries of staff or (b) costs incurred for the sole purpose of temporary exhibition display.
- Witnessed Destruction: This option should be considered if the object has deteriorated so severely that it is no longer useful, and/or if it poses a hazard to staff, public, and/or other items in the collection that is not an acceptable risk. If the condition of the object is a criterion for deaccessioning, a full condition report on the object should be completed by the Penn Museum Conservation Department prior to destruction. Privacy and confidentiality considerations may justify the destruction of archival materials.
- In no case shall a private sale, gift, or transfer to a for-profit institution or an individual be acceptable.

## E. Disposal of Undocumented Objects

If an object is undocumented, the Penn Museum must make a serious, diligent, and documented effort to learn more about it before considering it for disposal. This process may include:

- Determining as much about the object's status as possible – any record whatsoever of its documented history, even if incomplete.
- Consulting institutional records, such as accession records, old inventories, board minutes, old gift and loan agreements, correspondence, newsletters, etc., to attempt to connect the object with some documentation.
- Recording all additional information that is known about the object.

If an undocumented object is to be sold or donated, the Penn Museum can use a quitclaim deed that transfers claim and rights to the object to the new owner, with no guarantee of title transfer. Any risk of holding the undocumented object is therefore transferred to the new owner.

If an undocumented object is shown to have or can be reasonably assumed to have minimal value (intrinsic, monetary, research, etc.) to the organization, the Penn Museum may choose to donate the object to a nonprofit organization. The lack of title transfer will be transparently stated.

If undocumented objects are deemed to have deteriorated beyond repair or pose a risk to other objects in the Penn Museum collections, and/or if they have become a hazard to health and safety, immediate action as appropriate will be taken. Full condition reports on the objects should be completed by the Penn Museum Conservation Department prior to disposal.

If it is discovered during review that an object is an old loan, the Penn Museum will take steps to resolve the loan status as soon as possible. The Penn Museum may wish to consult legal counsel to ensure proper action is taken. The Penn Museum complies with Pennsylvania law, including any relevant statutory provisions as well as common law, regarding abandoned property and unclaimed objects.

## F. Ethical Considerations

The Penn Museum has a public responsibility and is accountable for the decision to deaccession an object, and for the method by which disposal is implemented. The procedure will be documented and there will be no effort to conceal the transaction.

Any proceeds resulting from the disposal of objects will be used either for purchase of acquisitions or direct care of the collection. Direct care is defined as investments in existing collections that enhance their preservation, usefulness, or quality and thereby ensuring they will continue to benefit the public.

## G. Documentation of Deaccession and Disposal

Responsibility to the needs and reputation of the Penn Museum requires that, in preparing for and carrying out deaccession and disposal, the Penn Museum will take care to publicly explain the purpose of the deaccession and the intended use of monetary or other proceeds of the disposal, to avoid detracting from the Penn Museum's mission of ethical stewardship, and to carry out the entire process with transparency and utmost care.

The complete procedure followed when deaccessioning and disposing of any object will be documented in collection records.

The deaccessioning process is documented in detail in the Museum's Deaccession Policy and Procedures.

The Williams Director will determine if a public statement is required for any deaccessions. If a statement is required, they will work with the Marketing & Communications Department to craft an appropriate statement that will be shared with local news outlets.

All documents related to the deaccessioning and disposal process will be deposited in the relevant collection files and retained permanently. Deaccessioning and disposal purpose and dates will be recorded on any object records, physical or electronic. The deaccessioned object's unique accession number will remain permanently in the institution's records, with clear indication that the records are no longer active.

## V. Incoming Loans

The Penn Museum borrows archaeological artifacts, anthropological artifacts, and archival collections for the purpose of exhibition and research as the Penn Museum's needs dictate.

### A. Approval Processes for Incoming Loans

Requests for objects from other institutions and individuals are to be proposed by the Curator and the Exhibition Team. The process for proposing incoming loans is detailed in the Incoming Loans Policy and Procedures.

The Director of Collections, and the Executive Team as needed, are responsible for approving incoming loans. The process for approving incoming loans is detailed in the Incoming Loans Policy and Procedures.

The Registrar's Office is responsible for ensuring appropriate documentation for incoming loans. The process for documenting incoming loans is detailed in the Incoming Loans Policy and Procedures.

### B. Terms and Conditions of Incoming Loans

Incoming loans will be accepted from individuals or institutions for exhibition and research. Because of the liability and expense, Penn Museum cannot store and maintain objects belonging to others that are not required for the aforementioned purposes.

The following criteria will be met before requesting or approving an incoming loan:

- The Penn Museum has determined that it can afford the estimated cost of exhibition, storage, security, transportation, collection maintenance, and all risk, wall-to-wall insurance for the objects on loan at the value established by the lender unless the lender waives insurance requirements in writing. The amount payable by such insurance is the sole recovery available to the lender in the event of loss or damage.
- If the lender prefers to provide insurance for the object while it is on loan, the lender shall list the Penn Museum as additional insured on its own policy or will obtain for the Penn Museum a waiver of subrogation.

- The Penn Museum can provide care and protection that meets or exceeds standards required by the lender.
- Only objects that can withstand the normal rigors of packing, transport, handling, and display will be accepted on loan at the Penn Museum. The Penn Museum will conduct a basic condition report upon receipt of a loaned object and prior to the object's return to the lender.
- The Penn Museum will meet any restrictions the lender has placed on the object.
- The Penn Museum will not perform any type of conservation, cleaning, reframing, repair, or other action that alters the physical condition of a borrowed object without written approval from the lender.

If objects are not claimed by the lending individual or institution at the end of the loan period, every effort will be made to contact the lender or their next of kin to coordinate return of the loan material.

If an object is damaged while on loan, the damage will be documented, and the lending institution will be contacted as soon as possible to discuss next steps.

### C. Long-Term Loans

The Incoming Loans Policy and Procedures addresses details regarding long-term loans, including renewals of the loan agreement.

If objects are found in the collection that were previously deposited at the Penn Museum as permanent or indefinite loans, staff will make all possible efforts to contact the lender or immediate heirs of the lender in order to:

- Convert the loan into a gift, if the object is consistent with the Penn Museum's mission and collecting criteria.
- Negotiate a new loan agreement with the lender.
- Return the object to the lender or the lender's heirs.

If staff are unable to locate and contact an object's lender, they must document all efforts and keep all documentation in the object's file.

If an individual or individual's heir claims ownership of a found-in-collection object and wishes for it to be returned, the burden of proof of ownership is on the claimant. The claimant must produce an original loan certificate in order to reclaim the object and an heir must also produce proof that they are the legal heir of the donor.

## VI. Outgoing Loans

The Penn Museum will loan archaeological artifacts, anthropological artifacts, and archival collections for the purpose of exhibition, research, and conservation.

### A. Approval Processes for Outgoing Loans

Outgoing loan requests must be reviewed by the relevant Curatorial Section, the Registrar's Office, the Conservation Department, and the Director of Collections. Final approval for outgoing loans must be obtained from the Curatorial Section, the Registrar's Office, the Conservation Department, and the Director of Collections.

Additionally, the Executive Team must approve any outgoing loans that include objects currently on display.

Outgoing loans must be documented by the Registrar's Office.

### B. Criteria for Outgoing Loans

The Penn Museum will evaluate requests to borrow objects for the purpose of exhibition and research at other institutions when the policies and facilities of those institutions meet accepted standards of security, climate control, and insurance coverage, and when proper credit is given to the Penn Museum. Institutions wishing to borrow objects should begin the process early (12 months for domestic loans and 18 months for international loans or more in advance) and must submit proper documentation before an agreement is signed.

To request an outgoing loan, the Penn Museum must receive a formal letter of request. This letter should be addressed to the Director and copied to the Registrar's Office who will be responsible for processing the loan and gathering approvals from necessary departments. The Outgoing Loans Policy and Procedures addresses details regarding the process for requesting outgoing loans.

When assured that proper care and protection will be provided, the Penn Museum may lend objects to other institutions provided that the following criteria have been met:

- No loans will be made to private individuals.
- At all times, the preservation of collections objects will take priority.
- Requests for loans should be received within the aforementioned period in advance of the expected delivery date.
- There are no restrictions on the requested object that preclude making the loan.
- The object is in good condition and can withstand the stresses of travel, handling, study, and/or exhibition.
- The loan will not jeopardize the institution's own exhibition, loan, research, and/or education programs and does not violate the institution's Code of Ethics.
- The borrower agrees to all conditions established by the institution.

### C. Duration

Loans from the Penn Museum will not exceed duration of three years, for exhibition loans. Loan duration is determined by the length of request, condition and use of objects, and the discretion of the Penn Museum. Exceptions to the three-year rule will be considered for research loans, whereby the initial loan period should not exceed five years but is renewable pending internal approval. All loans must include a specific termination date. All loans must be either renewed or recalled at the end of the loan period.

If the borrower wishes to keep an object beyond the end of the loan period, the possibility of renewal will be re-evaluated as the end of the loan period approaches, on an object-by-object basis.

### D. Requirements and Obligations for Borrowers

- General Facility Report

In order for the Penn Museum to consider a loan request, it is required that the borrowing institution complete a General Facility Report which documents the conditions under which the object will be displayed.

- Object Condition

The borrowing institution must complete a written condition report upon receipt of any loaned object, with an additional condition report completed prior to return of the object to the Penn Museum.

If an object is damaged while on loan, the damage will be documented by the borrower and the Penn Museum should be contacted as soon as possible to discuss next steps.

- Cost

The borrowing institution is responsible for paying administrative loan fees, conservation fees, mount making fees, packing and shipping fees, customs fees (for international loans), courier fees, and any other costs associated with the loan preparation and execution.

The borrowing institution is responsible for providing wall-to-wall insurance coverage, based on the insurance value set by the Penn Museum. The borrowing institution must provide a certificate of insurance prior to the loan material being released for shipment. A valid certificate of insurance must be on file with the Penn Museum at all times until the loan material is returned and in the Penn Museum's possession.

- Reproductions

The borrowing institution shall not permit the loan material to be 3D scanned, cast, copied, photographed, filmed, or reproduced for commercial purposes without the written permission of the Penn Museum, except for photography for personal use, by hand-held cameras or camera phones. The borrowing institution may photograph the loan material for curatorial purposes and condition reference purposes, providing such photographs are not released without the prior written consent of the Penn Museum and that the Penn Museum is provided with a set of prints and/or digital images. Photography of the loan material by the borrowing institution for catalog or other publication purposes must be approved in advance by the Penn Museum and requires a separate Reproduction Rights Form, which is distributed by the Photographic Archives.



## VII. Documentation

### A. Collection Records

The Penn Museum will initiate and maintain up-to-date records of all objects under its care, including gifts, purchases, loans, or any other type of acquisition, even if temporary. Collection records are maintained by the Registrar's Office and the Digital Records, Archives, and Publications Department. Collection records include, but are not limited to, accession records, registration records, catalog records, deeds of gift, loan forms, location records, temporary custody receipts, object use records, condition reports, deaccession records, photography records, and inventory records. The Registrarial Records Policy & Procedures and the Archives Collection & Access Policy include additional information regarding collection records.

The Penn Museum maintains paper-based records and electronic records. Electronic records are managed using EMu Collections Management System.

### B. Backup System for Records

The Penn Museum records will be safeguarded from loss, destruction, and degradation.

EMu is hosted on a local server, which is backed up daily using a University of Pennsylvania service. This service includes a daily incremental primary backup in the cloud with a secondary backup for redundancy.

### C. Inventory

To maintain, manage, and secure its holdings properly, the Penn Museum performs regular inventories.

- Partial inventories are conducted on a section-by-section basis every 5-10 years by the Curatorial Sections and the Registrar's Office.
- Spot inventories are conducted on a rolling basis by the Curatorial Sections and the Registrar's Office.

Inventory procedures are recorded in the Inventory Policy and Procedures

## VIII. Collections Care

The Penn Museum is responsible for the care and preservation of all objects in its custody, including all collection and loaned objects. Collections care and preservation activities are the responsibility of the Collections Division, which includes Curatorial Sections, the Conservation Department, the Registrar's Office, and Special Projects, in coordination with other staff, volunteers, and community members, as applicable. In addition to performing the types of care and management described in other sections of the policy, the Penn Museum will:

- Carry out all legal, ethical, and professional responsibilities required to provide the necessary care for all objects acquired, borrowed, or placed in the custody of the Penn Museum.
- Take measures to prevent theft, vandalism, destruction or damage by pests, fire, water, or other elements.
- Maintain a comprehensive collection preservation program.
- Ensure that dedicated funds are available for collections care and conservation.
- Appropriate storage conditions will be maintained in offsite storage at LIBRA (Penn Libraries Research Annex) and CLA (Conservation Lab Annex). Decisions regarding which objects will be sent to LIBRA (Penn Libraries Research Annex) and CLA (Conservation Lab Annex) are made by the Collections Division in conjunction with the Executive Team.
- Monitor all storage areas to ensure appropriate environmental conditions and employ strategies to remediate any concerns.
- Perform in-house assessments of collections as objects are accessioned, in response to problems that are revealed during object use, through regularly conducted inventories, through condition surveys of specific collections, and when objects are chosen for exhibition.
- Ensure collections are physically protected through the use of secured storage areas, appropriate housings, building-wide security systems, and regular collection maintenance.
- Address conservation needs concerning damage or stability of collections by consulting the Conservation Department.
- Ensure that objects are handled appropriately as described in the Guidelines for Handling Artifacts.
- Regularly monitor for pests and ensure that an integrated pest management program is in place to prevent or mitigate issues.
- Practice regular housekeeping procedures throughout the building in order to maintain proper storage and exhibition conditions for the collections, deter unwanted pests, and expedite salvage procedures in the case of an emergency. These procedures are outlined in the written Housekeeping Guidelines. The Facilities Department is responsible for general housekeeping of galleries and

exhibitions, including cleaning floors and non-casework. The Conservation Department, through their Gallery Technicians, is responsible for in-case housekeeping, as well as the cleaning of exposed objects. Housekeeping for storage spaces is detailed in the Collections Storage Maintenance and Cleaning Guidelines.

- Perform routine building inspections to ensure a secure building envelope and alleviate structural or environmental concerns. Regular maintenance duties are the responsibility of the Building Operations Department.

The Penn Museum has a dedicated Conservation Department that employs both full-time permanent and term-limit professional conservators and part-time technicians. Conservation work takes place in the Museum lab spaces as well as temporary locations both on and off-site, as required. Conservation staff coordinate and advise on preventive conservation practices and stabilize the collections beyond preventive measures when necessary and appropriate, usually for exhibition and loan. Additional details can be found in the Conservation Policy and Procedures.

## IX. Insurance and Risk Management

### A. Insurance

Though insurance is not a substitute for safety, security, or professional collections care, it does provide compensation in the event of loss or damage. The Penn Museum will provide fine arts insurance coverage for its collections and property and casualty insurance for the building and grounds.

University of Pennsylvania's Office of Risk Management and Insurance is responsible for the review and renewal of the Penn Museum's collections insurance policy annually.

### B. Risk Management

All collections, buildings, and grounds of the Penn Museum should be secure and protected from vandalism, criminal activity, and accidents.

The Penn Museum must conduct periodic reviews of potential risks to the collection including fire, natural disasters, vandalism, theft, human error, mechanical or operational system failure, pests and deterioration. The Penn Museum should maintain regular contact with the local fire and police departments. Personnel from these agencies should be aware of the historical value and significance of the Penn Museum. Copies of the Penn Museum's floor plans should be held at the local fire department.

The Penn Museum maintains a comprehensive security plan, which governs all areas of collection security from physical space control to patron and staff use regulations. The Building Operations Department, in coordination with the University of Pennsylvania's Division of Public Safety, is responsible for maintaining the security plan.

The Penn Museum maintains a security system. The security system consists of closed-circuit television (CCTV), passive infrared motion detectors, the C-Cure access monitoring system, and in-person 24-hour human guard security. The security system is inspected via a preventative maintenance agreement with Allied Universal and Johnson Controls. The Building Operations Department is responsible for the regular inspection of the security system.

The Penn Museum must ensure that an Emergency Preparedness and Response plan is in place in order to mitigate potential damage in the event of a disaster or emergency. The contents of the plan, particularly procedures, contact lists, and collections priorities for salvage and/or conservation, must be reviewed and updated periodically. The plan is intended to be reviewed annually, and more frequently, if necessary, by the Collections Division.

The fire detection system consists of a centrally monitored fire detection system. The system is inspected annually, in addition to quarterly drills. The Building Operations Department is responsible for the regular inspection of the fire detection system.

The fire suppression system consists of a wet-pipe sprinkler system throughout the building. Fire extinguishers are centrally located on each floor of each wing of the building. The system is inspected every six months by Cintas and Penn Fire Safety. The Building Operations Department is responsible for the regular inspection of the fire suppression system.

The water detection system consists of water sensors placed in strategic locations. The system is inspected as needed when a sensor is not functioning properly. The Collections Division is responsible for the regular inspection of the water detection system.

Staff will be trained in the proper use of fire extinguishers, fire drills, evacuation procedures for members of the public and staff, evacuation procedures for collections, and disaster response and recovery for collections.

## X. Access and Use

### A. Collections Access

Core to the Penn Museum's mission is to make its collection accessible to the public for education, research, exhibition, conservation, publication, and reproduction. The imperative to provide access must be balanced with the Penn Museum's responsibility to preserve and safeguard its objects. Policies governing access to the collection include the physical collection materials as well as reproductions of the collection and collection documentation. Laws regarding privacy and freedom of information will be observed where applicable.

The Penn Museum welcomes and encourages researchers and descendant community members to make use of its collections. Additionally, the Penn Museum welcomes faculty and instructors to integrate the collections into their curriculum in order to foster student engagement. Mitigating circumstances, including but not limited to inaccessibility, fragility, publication status, sacred nature, construction, and time constraints, may restrict access to some materials. Additional information on researcher and student use of the collections can be found in the Collections Access Request Form and the Class Visit Request Form.

Members of the Collections Division and the Executive Team have access to collections storage spaces. All others must arrange to be escorted by a member of the Collections Division.

The Penn Museum maintains an online collections resource which is publicly accessible.

### B. Terms and Conditions

Members of the public may request to examine or study collection items. Appointments must be made in advance and will take place during normal business hours.

Collections are accessible contingent upon staff availability and consistent with accepted security and preservation practices. The Penn Museum reserves the right to refuse access to certain objects in the collection. The Penn Museum may also limit

the number of researchers using particular collections at one time.

Users must comply with the Penn Museum's procedures regarding examination and handling of objects, personal photography, and the use or dissemination of collection information. Requests to reproduce visual images (photography and video) of the collections, as well as 3D reproduction requests, must be made in advance and are subject to the Penn Museum's publication guidelines and fee schedule. All image use must be credited as required and a gratis copy of any resulting work must be provided to the Penn Museum upon publication. To protect the confidentiality of donors and the security of the collection, access to certain information in the object files may be restricted (e.g., donor contact and other personal information will not be provided). The Penn Museum reserves the right to deny access to other types of information contained in its collection records, such as insurance and appraisal values, but in all cases legal guidelines regarding privacy and freedom of information will be observed, as applicable.

# XI. Intellectual Property

## A. Photography & Reproduction

The copyright law of the United States (Title 17, USC) governs the making of photocopies or other reproductions or images of copyrighted material.

Photography of collections is permitted given the use is for non-commercial or educational purposes. Requests are made by completing the Photography/Illustration Permission Form. The Penn Museum Archives is responsible for approving requests for photography.

Filming of collections is permitted given that the photographs and illustrations are only used for research purposes, including public presentations. The photographs and illustrations are not eligible for further reproduction, distribution, exhibition, or publication. Requests are made by completing the Photography/Illustration Permission Form. The Penn Museum Archives is responsible for approving requests for filming.

Photocopying or scanning of collections or collection documentation is permitted given that the documentation is not deemed to be of a sensitive nature. Requests are made by contacting the Penn Museum Archives, which is responsible for approving requests for photocopying. Three-dimensional scanning, including photogrammetry and other methods, is permitted provided that the resulting files are only used for research purposes. A 3D Data Capture Use Permission Form is required before capture, and the resulting files must be provided to Penn Museum. 3D printing is permitted on a special case-by-case basis.

## B. Publishing

In granting permission to publish material obtained from the Penn Museum, the Penn Museum does not assume responsibility for infringement of copyright or of publication rights of material which may be held by others; the publisher assumes all responsibility for claims under the Copyright Law of the United States or for libel claims which may be made as a result of the publication.



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