

**Collections Management Policy**  
***Center for Archaeological Research***  
***The University of Texas at San Antonio***

**I. Mission Statement**

The Center for Archaeological Research (CAR), established in September 1974, is a research facility of the Department of Anthropology at The University of Texas at San Antonio (UTSA). As an organized research unit, CAR's main objectives are: (1) to provide students publication and teaching opportunities as well as training in archaeology and anthropology via field and laboratory work on ongoing projects; (2) to provide outreach services that educate the general public about anthropology and archaeology; (3) to provide cultural resource management services to federal, state, local, and private agencies as required by legislation and executive order; and (4) to furnish long-term care for "Held-in-Trust" (HIT) collection for the people of Texas and the United States.

CAR's archaeological laboratory, a certified curatorial repository as designated by the Texas Historical Commission (THC), has the necessary facilities for processing artifact collections. It houses extensive collections from prehistoric and historic sites in Texas. Some collections are displayed in the Legacy Classroom for viewing by students, teachers, and visiting scholars. CAR's archaeological team is supported by its own administrative staff and by university offices. These offices, e.g., the Office of Sponsored Projects, provide fiscal control, project management, and other services. CAR draws upon the faculty and staff of UTSA for expert assistance in such fields as anthropology, history, geology, ecology, botany, and computer sciences.

**II. Scope of Collections**

As a certified state archaeological repository, CAR curates records and collections from other institutions, agencies, and individuals on a contracted basis and from private donations. CAR primarily holds collections from historic and prehistoric sites from south and south-central Texas. Records and artifacts are accepted with the understanding that they will be made available for research to students, faculty of the Department of Anthropology, scholars, and other authorized persons. Although the acceptance of collections is generally limited to south and south-central Texas, CAR will consider accepting collections from other areas when these collections benefit the center's overall research goals.

**III. Staff**

The Curator has primary responsibility for maintaining the collections, authority to accept new collections within CAR's scope, and authority to establish loans to and from the CAR holdings. The CAR director has oversight responsibility for the professional performance of the curator and is accountable for the fiscal soundness of the operating budget dedicated to collections maintenance. The CAR Director reports to the Chair of the Department of Anthropology regarding policies and activities related to collections. The Dean of the College of Liberal and Fine Arts and the University of Texas at San Antonio are legally accountable for the CAR holdings including financial commitments to the care and maintenance of the collections.

**IV. Legal Jurisdiction and Responsibilities**

Collections housed at CAR are predominately owned by either the State of Texas or by Federal agencies. State of Texas collections fall under the jurisdiction of the Texas Administrative Code, Title 13, Part II, Chapter 29. This includes the Certified Curatorial

Repository program administered by the Texas Historical Commission. State regulations for collections care closely correspond to the American Association of Museum's (AAM) accreditation of institutions. Federally-owned collections fall under the jurisdiction of various federal agencies, including, but not limited to, the National Park Service, the Bureau of Reclamation, and the United States Armed Forces. Practices and procedures for the custodial care of collections are in agreement for both State and Federal HIT collections.

Multiple federal regulations, including the National Historic Preservation Act (NHPA), the Archeological Resource Protection Act (ARPA), and the National Environmental Policy Act (NEPA) govern activities that result in archaeological collections. The care and control of the collections generated by these activities are mandated by two main pieces of legislation: Federal Code of Regulations 36CFR Part 79 and the Native American Graves and Repatriation Act (NAGPRA).

## **V. Acquisitions**

The CAR primarily accepts collections from south and south-central Texas. Acceptance of collections from other areas will be considered if the materials are representative of the broader regional and thematic areas already held by CAR. The collections and records stored in the CAR facility have been donated, loaned, or generated through cultural resource management activities.

- A. Acquisition is a necessary prerequisite for accessioning
- B. Restrictive or conditional acquisitions are discouraged
- C. For State of Texas associated HIT collections, the following apply:
  1. only collections for which clear title or HIT status is established are acquired;
  2. stewardship of a collection, but not ownership, is transferred to the CAR repository;
  3. an annual report of acquisition activities is made to THC regarding state-associated HIT collections.
- D. Collections and records produced by compliance projects must be accompanied by a transfer of custodianship from the state or federal agency to CAR. A contractor acting on behalf of a regulatory agency must obtain permission from the custodial agent and submit the appropriate documentation with an original signature before submitting project materials to CAR.
- E. CAR will not accept any donated materials without a title transfer. A Deed of Gift form signed by the person(s) holding legal title to the artifact(s) is required prior to the acceptance of a donated collection.
- F. A separate policy exists for NAGPRA associated collections. Generally, CAR will not accept any human remains without the submission of clear documentation regarding NAGPRA status. The CAR Director reviews all proposed accessions of human remains.

## **VI. Accessions**

- A. Potential accessions are first recorded in the CAR accession database as requests. Upon acquisition each project is assigned a unique accession number. CAR accession numbers are sequential numbers with the prefix "CAR". An annual report of accessioning activities of all state-associated HIT collections is made to the THC.
- B. The submission of archaeological collections and associated records generated through cultural resource management activities will be accepted for storage at CAR when these collections meet the criteria specified in the CAR's stated Scope of Collections. Each submission will be assessed against the CAR curation standards as published on CAR's webpage. This assessment will include, but is not limited to:
  1. a review of the processing record for cleaning and preservation treatments,

2. a verification that artifact labeling is legible and on the appropriate types and quantities of items,
  3. a confirmation that 4 mil thickness polyethylene zip-locking bags were used,
  4. a review of artifact tags and bag labels for required information and for acid and lignin content,
  5. a verification that artifacts are logically sorted,
  6. a review of documentation for soiled, oversized, fragile, or acid papers,
  7. a reconciliation of photographic materials to photographic logs, and
  8. a reconciliation of the specimen inventory to the artifacts submitted.
- C. When collections do not meet these standards, the submitter can take back the collection for additional work, or CAR can correct the deficiencies for a standard fee.
- D. All collections must be accompanied by the set of forms required by CAR to create the accession file (see VII – Record Keeping).

## **VII. Record Keeping**

- A. The accessioning of any state HIT collection is initiated with the creation of an accession file. This contains the following records:
1. accession record,
  2. THC HIT agreement and artifact curation form,
  3. signed request for curation space at CAR,
  4. artifact catalog,
  5. transfer of legal title and custodianship to CAR,
  6. collection processing record,
  7. curation submittal checklist,
  8. deaccession record (if applicable),
  9. condition report (if applicable),
  10. loan agreement (if applicable),
  11. relocation and/or spot-check inventory (if applicable),
  12. conservation report (if applicable),
  13. infestation report (if applicable).
- B. Federal held-in-trust and donation accession files are similar but do not contain THC HIT paperwork. Duplicate copies of the HIT accession files are kept in a secure off-site location and are updated on a scheduled basis. A digital copy of the HIT accession files is stored on the Curator's computer desktop (see item F. below).
- C. The annual report to the THC will include any activities involving acquisition, accessioning, deaccessioning and disposals, inventory, incoming and outgoing non-destructive loans, destructive analysis loans, security issues, and conservation actions.
- D. The CAR collections management database is organized to track all collections data. It contains data regarding legal ownership, TAC permit agency number, site trinomials, associated reports, project date, loans, destructive analyses, deaccessions, box locations, record locations, as well as a summary inventory of the records and collections. This system tracks accessions from the time a request is made for curation space at CAR through the accession procedures and subsequent collection management activities.
- E. CAR uses a cataloging system to record the physical attributes of the artifacts and make the objects more easily identifiable and accessible. It is a provenience-based cataloging system designed to identify objects and their provenience. The catalog number series is applied to the object and is listed on the artifact inventory.
- F. The electronic database for the CAR collections is maintained on University servers. These are backed up Monday through Saturday and are maintained for two weeks. The curation database is also backed up weekly on the Curator's desktop which is backed up

daily by CrashPlan Pro. Additionally, an archival gold DVD containing PDF versions of all records is burned for each new accession. Older projects may not be on DVD.

#### **VIII. Deaccession and Disposal**

- A. Only the Curator has the authority to select objects/records to be deaccessioned. The CAR Director must approve the selection. The majority of CAR's collections are derived from compliance with state and federal regulations. Any proposed deaccessions fall under these agency's corresponding rules. An annual report of deaccessions of state HIT collections will be made to THC.
- B. State of Texas associated collection deaccessions are evaluated in terms of:
  - 1. redundancy and lack of additional merit;
  - 2. lack of historical, cultural, or scientific value;
  - 3. damage beyond reasonable use and repair;
  - 4. being subject to deaccessions as required by federal law;
  - 5. being noted as missing or stolen.
- C. Objects/records selected for deaccessioning are transferred or disposed of as follows:
  - 1. consideration will be given to placing the object in the Legacy Education Collection, or teaching collections in other departments of the University, or other educational institutions;
  - 2. if the object/record cannot be disposed of as above it will be destroyed by the Curator,
  - 3. the disposal method is both documented and witnessed,
  - 4. all identifying numbers or labels are removed prior to disposal,
  - 5. objects/records are not sold, given as gifts, or otherwise transferred to individuals or organizations other than those listed in item 1.
- D. Deaccessions of CAR holdings not under state and federal oversight are based on the amount and quality of the available provenience information, scientific value, and long-term research potential.
- E. Deaccessions of CAR holdings due to repatriation to Federally Recognized Tribes fall under NAGPRA regulations. It is currently CAR's policy to retain all paper and digital records related to NAGPRA collections. The records are restricted and are currently not available for research. CAR will release original records to Federally Recognized Tribes if requested as part of a repatriation. CAR will retain paper and digital copies of the repatriated records.

#### **IX. Loans**

- A. Loans are processed to further CAR's missions of research, education, and public outreach. Only individuals who are both affiliated with a research institution, contract firm, or the Texas Archeological Society, and holding an advanced degree in Anthropology or a related field will be considered professionally qualified to obtain loans from CAR's holdings. An individual with avocational status who is associated with the Texas Archeological Society through direct membership or through membership in an affiliated regional organization is required to have a sponsoring professional archaeologist meeting the aforementioned criteria as a loan cosigner. Loan requests must be accompanied by a research proposal or exhibition housing details.
- B. The CAR Curator will make the final decision regarding the loan period. Loans are renewable; however, materials that have been on extended loan may be recalled at the discretion of the Curator.
- C. No materials are ever loaned without a current inventory.
- D. For State of Texas HIT collections:

1. loans are for the purpose of research, education, exhibition, conservation, or inspection;
2. loans are for a specified period of time;
3. loan documents should state any special requirements for the loan;
4. outgoing loans are made between institutions;
5. incoming loans are made between institutions and may be made from individuals;
6. loans are insured for the duration of the loan;
7. loans are insured commensurate with the evaluation of the objects as determined by the curatorial facility;
8. collections that are not accessioned and/or cataloged are not loaned;
9. commercial use of loaned collections is prohibited;
10. an annual report of loan activities is made to the THC regarding state-associated HIT collections.

**X. Destructive Loans**

- A. Destructive loans are made for the purposes of obtaining research relevant data at the expense of an object either wholly or in part. The information obtained is provided as a substitute for the object or portions of the object destroyed during analysis. This information along with any unused portions is provided to the repository as a condition of the loan.
- B. The following additional regulations apply to all State HIT collections:
  1. decisions regarding the destructive analysis of State HIT collections are the legal responsibility of the THC and all destructive analysis requests except those in approved categories are forwarded to the THC;
  2. authority to approve certain types of destructive analysis requests as outlined in the Agreement for Approved Categories of Objects is delegated to a certified curatorial facility;
  3. the state does not relinquish title, nor is the object deaccessioned;
  4. an annual report of destructive loan activities is made to the THC regarding state-associated HIT collections.

**XI. Inventory**

- A. A baseline inventory will be created for every submitted collection during the formal accession process. If the collection accessioned has been generated through state or federal permitting process, it must be submitted with an inventory. This inventory will be reconciled against the collections.
- B. Artifact inventories are compiled for each project, including catalog numbers, artifact class and description, artifact count, and provenience information.
- C. Periodic spot-check inventories are conducted as well as relocation inventories during any relocation activity.
- D. Prior to any loan, a collection will be inventoried.
- E. A separate inventory is maintained for State HIT collections. An annual report of inventory activities is provided to the THC.

**XII. Insurance**

As an institution of higher learning of the State of Texas, The University of Texas at San Antonio is considered self-insured. This applies to all buildings and materials held within. A waiver of additional insurance as stipulated in the THC's curatorial repository certified program has been provided to CAR.

**XIII. Appraisals**

The CAR does not provide appraisals to prospective donors or the public in general. Any donor wishing a professional appraisal must obtain it at his/her own expense from an independent appraiser prior to donation.

#### **XIV. Access to Collections**

- A. The collections stored at CAR are held in trust for the people of the state of Texas and the United States. For the protection of the collection only qualified researchers or students engaged in legitimate research are allowed access to CAR's collections.
- B. A research proposal must be approved in advance by the Curator and/or the CAR Director before access is granted. CAR reserves the right to deny access to persons without a valid scientific research plan.
- C. State certification delegates the authority for access to State HIT collections to the repository.
- D. For federal collections, the controlling agency will be consulted prior to granting access.
- E. Currently human remains, associated artifacts, and associated records are not available for research due to NAGPRA regulations.

#### **XV. Collections Care**

Because collections management and curation standards have evolved over the 42 years of CAR's existence, not all collections are in compliance. It is the aim of CAR staff to update the conditions of all the collections.

- A. The collections are stored in locked cabinets. Most are in archival quality polyethylene boxes and identified with tags sleeved in polyethylene sleeves attached by double-stick tape. Records, prints and negatives, slides, and any associated databases or software are placed in archival quality storage folders and jackets which are then stored in standard legal size (27"x15"x10.5") metal filing cabinets. Oversized maps are placed in archival quality jackets and stored in metal map cabinets.
- B. Tobacco, food, and drink are prohibited in the collections storage area.
- C. The maintenance of collections at a level of high quality archival care is supported to the limit of the fiscal abilities of the CAR. The payment of a fee, required for acceptance of CRM generated collections, is the main source of collections management funding. Additionally, the UTSA has historically provided and continues to provide funding dedicated to all aspects of collections maintenance and care. External sources for grants and matching funds are continually sought to maintain and upgrade the collections.
- D. For all state HIT collections, the following apply:
  1. temperature, relative humidity, and atmospheric pollutants are monitored and regulated;
  2. light levels are low and/or filtered (via enclosed storage cabinets);
  3. an integrated pest management system is employed;
  4. archival housing units provide a buffer between collections and the environment;
  5. archival packaging materials provide a buffer between collections and the environment;
  6. preventive conservation strategies are utilized;
  7. routine preventive maintenance is practiced;
  8. objects/collections are safely handled and moved.
- E. CAR maintains a database of environmental conditions including temperature and humidity levels. Because collections are housed in locked metal cabinets, light levels are not an issue. Six HOBO devices monitor temperature and humidity 24 hours a day. Dehumidifiers are stationed within particular parts of the facility to remove excess water vapor during the more humid times of the year.

- F. The CAR building is monitored by UTSA's Environmental Health, Safety and Risk Management Program. At three year intervals data on mold, pollen, and dust levels, as well as the chemical composition of the air is collected.

#### **XVI. Conservation**

State HIT collections require that:

- A. the THC approves conservation treatments prior to their commencement, unless the THC has delegated this authority in writing to the curatorial facility through the Agreement for Approved Categories of Objects;
- B. conservation treatments are performed only by trained conservators;
- C. conservation treatments are reversible in nature and are carried out with compatible materials;
- D. conservation treatments are documented prior to, during, and after completion;
- E. annual reports are made to the THC on conservation treatments regarding state HIT collections.

#### **XVII. Disaster Management**

The Office of Emergency Preparedness at the University of Texas at San Antonio has developed an Emergency Preparedness Plan with the UTSA Police Department acting as the Incident Command Operations Center. The UTSA Police Department will contact the Emergency Response Team members who will in turn contact CAR's Director, Assistant Director, Administrative Officer, and the Curator. The Response Team includes members that cover personnel and property risk management and safety, as well as the consequences of flood, fire and natural disaster events. The Preparedness Plan requires testing and drills that covers these topics. Each building at UTSA has an assigned captain trained to facilitate the protection of personnel in evacuations and to report localized situations requiring the larger response team's efforts.

#### **XVIII. Pest Management**

- A. The University grounds staff periodically applies a chemical barrier along the foundation of the exterior of the CAR building and monitors the vegetation growth along the foundation and the roof line.
- B. Non-chemical methods of pest control are used within the CAR building. The Curator uses a detection system of glue traps placed between the rows of storage cabinets and along the perimeter of the space to monitor insects. The locations of the traps are permanent to allow monitoring of variability in insect populations within the facility. The traps are collected and data is retrieved once a month.
- C. Insects commonly found on traps include crickets, beetles, gnats, and spiders. Higher than usual numbers of pests are treated by determining their location, based on glue trap data, and isolating the suspect boxes and/or by repackaging the contents of the box.
- D. All incoming collections are inspected prior to incorporation with the existing collections.
- E. All new staff, interns, and volunteers are informed of the non-toxic or least toxic measures taken to minimize and control pest infestations.

#### **XIX. Security**

- A. Chapter 8 of the University of Texas at San Antonio Handbook of Operating Procedures stipulates the access procedures to keyed locations. The Curator, the Lab Director, and the CAR Director are the only personnel with direct access to keyed locations within the repository.
- B. Collection cabinet keys are kept in a lock box. Only the Curator and Lab Director have lock box keys. The CAR plans to use locks on the record file cabinets in the near future.

- C. Entry to the CAR building by non-employees is controlled with a badge and sign-in procedure. Visitors are always accompanied by CAR staff. CAR staff members are granted access to collections with the permission of the curator.
- D. No objects or records may be removed from the facility without a formal loan.
- E. The front exterior doors to the CAR building are wired with card readers to monitor activity in and out of the building after normal business hours when an alarm system is engaged. The fire alarm system is similarly equipped. The UTSA Police Department is the main contact for any alarm incidents. The back exterior doors are locked and alarmed at all times. The curator and the administrative staff have keys to turn the alarms off.