

FIELD MUSEUM OF NATURAL HISTORY
COLLECTIONS MANAGEMENT POLICY

PREFACE

The current version of the Field Museum of Natural History's ("Museum") Collections Management Policy ("CMP," "Policy") was approved by the Board of Trustees ("Trustees") on June 11, 2024, with additional revisions to the Repatriation Section approved on September 24, 2024, and is to be interpreted in accordance with the Museum's purpose, mission, and Code of Ethics.

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I. INTRODUCTION

A. IMPORTANCE OF THE MUSEUM’S COLLECTIONS

The Field Museum of Natural History (“Museum”) is established under the laws of the State of Illinois as a not-for-profit organization dedicated to serving the public. The Museum’s primary purpose as articulated in its 1893 Articles of Incorporation is to accumulate and disseminate knowledge of natural and cultural history and to preserve, exhibit, and use collections. The Museum’s unique responsibility, which distinguishes it from schools, universities, and research institutions, is to strategically acquire, study, and preserve its scientific and heritage collections and to promote their accessibility and use. The Museum’s collections are held in perpetual trust for the public, especially the people of the State of Illinois.

The Museum’s mission is to connect all of us to the natural world and the human story. In support of this mission, the Museum acquires and preserves collections concerning the composition and evolution of the Earth and our Universe, and all forms of life, past and present, non-human and human. Each collection reflects a different historical pattern of development and emphasis that traces back to the founding of the Museum upon the close of the 1893 World’s Columbian Exposition in Chicago. Many of the collection materials are internationally significant and cannot be duplicated or replaced.

The collections form a basis for the continuing reappraisal of our knowledge of the past, present, and future. Original research based upon the collections is carried out by members of the Museum staff and by scholars throughout the world. That research is shared with the public through publications, exhibits, lectures, interviews, tours, and other education and outreach programs.

B. PURPOSES OF THE COLLECTIONS MANAGEMENT POLICY

This Policy establishes the Museum’s standards for the acquisition, management, use, and disposition of the Museum’s collections, formally accessioned and non-accessioned, in the disciplines of anthropology, botany, geology, zoology, and the library, together referred to herein as the “collection,” and includes the associated accession, catalog, and conservation records. This Policy does not apply to teaching collections used by the Museum in its public education programs or other Museum property, such as items used solely as decor or as props for exhibition.

Standards addressed by this Policy include:

- compliance with applicable laws and regulations, both domestic and foreign;
- compliance with the Museum’s and other applicable codes of ethics; and

- meeting or exceeding current standards for acquisition, management, transfers, and removal of collections.

II. AUTHORITY AND RESPONSIBILITIES

A. TRUSTEES

Under Illinois law, the Trustees have a fiduciary obligation to protect and preserve the Museum’s collections. While the Museum’s staff carries out the day-to-day operations of the Museum, the Trustees are responsible for establishing policies and overseeing major decisions regarding the Museum’s collections. Where appropriate, the Trustees may delegate these responsibilities to Trustee committees or subcommittees. As specified within this Policy and the respective committee charters, the Trustees have delegated responsibility for the Museum’s collections to the Collections Committee and, in the case of certain repatriation matters, to the Repatriation Subcommittee of the Collections Committee.

B. SENIOR ADMINISTRATION

The term “President” as used herein shall refer to the Museum’s Chief Executive Officer, and the term “Vice President” as used herein shall refer to the Museum’s Vice President of Collections, Conservation, and Research (“CCR”). The President and Vice President are responsible for the implementation of policies, oversight of the collections, and for the delegation of day-to-day management of the collections.

C. COLLECTIONS, CONSERVATION, AND RESEARCH CENTERS

Collections, Conservation, and Research at the Museum comprises three scientific centers – the Gantz Family Collections Center (“GFCC”), the Negaunee Integrative Research Center (“NIRC”), the Keller Science Action Center – plus the Center for Repatriation. For the purposes of this Policy, it is primarily the staff members of the GFCC and NIRC who oversee, pursue scientific inquiry, safeguard, and facilitate access to the collections for researchers, educators, community-scientists, cultural heritage groups worldwide, and other stakeholders. The President and Vice President delegate authority and oversight of the day-to-day management of the collections to the Senior Director of the GFCC (the “Director”) and to the Collection Administrative Teams (“CATs”) as defined below.

D. COLLECTION ADMINISTRATIVE TEAMS

Each Collection Administrative Team shall be responsible for setting and implementing priorities and for the day-to-day management of the portion of the collection, e.g., mammals, lichens, paleobotany, Asian anthropology (each a “collection area”), it oversees. Each CAT shall meet and confer regularly, ensure their Collection Area Procedures (“CAPs,” described below) are implemented effectively and are updated as necessary, keep the Director informed of important issues, and carry out any other obligations detailed in this Policy and their Collection Area Procedures.

Each CAT shall be of equal representation from the GFCC and NIRC. Equal representation is achieved either by membership from each Center (i.e., equal number of NIRC and GFCC staff) or by weighted voting (i.e., the combined voting power of all GFCC members of the CAT equals the combined voting power of all NIRC members of the CAT). Each CAT’s scope and membership shall be approved by the Vice President based on recommendations from the Directors of the GFCC and NIRC. A CAT will typically include at a minimum the appropriate Collection Manager for a Collection Area and a Curator with relevant expertise in the Collection Area.

In the case of the Anthropology Collection Area, the Collection Area Representatives (“CAR”) is an Anthropology Collection-wide CAT composed of the Head of Anthropological Collections for the Collections Center and the Head of Anthropological Research in the Negaunee Integrative Research Center. The CAR shall review recommendations from the Anthropology CATs and shall make final decisions on whether to approve acquisitions, deaccessions, destructive analysis requests, loans, and interventive conservation treatments. When a CAT cannot come to an agreement about a decision or recommendation, then the CAR shall mediate the disagreement and, if necessary, make a decision.

In the case of the Library, the Head Librarian acquires new materials in consultation with the CATs as well as other staff. Removals of out-of-scope, duplicative, and underused materials are conducted in consultation with the relevant CAT.

Decision-making authorities can be further outlined in the respective Collection Area Procedures, and the Vice President shall approve these and any exceptions or variations from the structure detailed herein.

E. COLLECTION AREA PROCEDURES

Each Collection Area shall maintain and keep current Collection Area Procedures through the responsible CAT, which is primarily responsible for creating, updating, and implementing the Procedures. The Director or Vice President shall initiate the review of the Collection Area

Procedures at least every five (5) years during review and revision of the Collections Management Policy to ensure continued compliance with this Policy, however, the CATs are encouraged to review and update their procedures more frequently or on an as-needed basis to address issues of concern. All revisions shall be reviewed by the GFCC Director and approved by the Vice President.

Collection Area Procedures will necessarily vary to address each Collection Area's salient issues and needs. However, each Collection Area Procedure shall include, at minimum, guidelines for the following:

- annual planning for new acquisitions and curation;
- collections safety and security;
- oversight of loan programs:
- access control, particularly concerning scientific affiliates, interns, students, and other individuals who are not regular Museum employees;
- review, approval, and recall of loans;
- pre-approval for taking in large collections;
- annual reporting on acquisitions, accessions, and deaccessions;
- requests for non-NAGPRA repatriation/ethical returns;
- requests for deaccessions and transfers;
- addressing "orphan collections";
- extraction and destructive sampling of collections specimens and items;
- approval, reporting, storage, and inventory of personal collections kept on-site; and
- collecting by scientific affiliates, postdoctoral researchers, and students.

Collection Area Procedures must be consistent with this and other Museum policies. Exceptions to these policies must be reviewed by the GFCC Director and approved by the Vice President.

III. ETHICS

A. GENERAL PROVISIONS

The Museum is bound by its own *Code of Ethics*, and it adheres to the American Alliance of Museums' *Code of Ethics for Museums* and relevant international conventions (e.g., CITES, UNESCO). Where specific laws, regulations, or policies do not govern an individual's activities, that individual shall be guided by the generally accepted professional and ethical practices of their discipline.

B. ETHICS OF ACQUISITIONS

In all actions, the Museum and its staff must act as responsible citizens, conservationists and scientists aiming to preserve and guard the biological, geological, and cultural heritage of the earth.

Specimens, items, or other materials shall not be acquired that have been collected recently in such a careless manner as to impair their scientific value, e.g., materials with inadequate documentation, or cause harm to their communities or descendant communities of origin.

Collections that involve unnecessary destruction of habitats or sites, or specimens of taxa having limited numbers or a tenuous existence, shall be subject to thoughtful scrutiny by the CAT prior to collection and acquisition. Museum staff shall exercise due diligence in the acquisition of collections, including making reasonable inquiries into the provenance of items under consideration for acquisition. Inquiries shall be made in order to determine that the Museum can acquire valid title to the collection item and that the acquisition will conform to all legal and ethical standards.

C. APPRAISALS AND IDENTIFICATIONS

Museum staff shall not provide appraisals except for the Museum's own internal purposes (e.g., insurance, determining fair purchase prices when acquiring objects for the Museum, deaccessioning, etc.). Museum staff shall not provide appraisals for the purpose of establishing the tax-deductible value of gifts offered to the Museum. Staff also shall not identify or otherwise authenticate items or specimens under circumstances that could encourage or benefit illegal, unethical, or irresponsible traffic in such materials. Identification and authentication may be given for professional or educational purposes and in compliance with the legitimate requests of professional or governmental bodies or their agents.

D. USE OF MUSEUM PROPERTY AND SERVICES

Museum collections, facilities, equipment, supplies, or personnel may not be used for the maintenance, conservation, or storage of personal or other non-Museum collections, except with the written permission of the Vice President, and approval shall be given only when it will be in the best interests of the Museum. Personal or other non-Museum collections should adhere to the specific collection's management standards and should be segregated so as not to cause confusion with cataloged materials. In cases in which Museum collection supplies, such as boxes, drawers, and labels, are used to document and store the collection, an agreement for the eventual donation of the collection to the Museum must be in place. Individuals may not use the Museum's permits, legal authorizations, or name to acquire or import items or specimens for personal use; any specimens or items collected under the Museum's permits or name shall be

legally owned or held by the Museum or one of its partner organizations as specified by a written agreement.

Non-Museum work is to be conducted elsewhere, and outside work that is similar to that for which one is employed is to be carried out in such a way that there is no possibility of conflict of interest.

Personal book collections used for work purposes, and personal collections reasonably outside the scope of the owner's professional subject matter area and used primarily as office decoration are exempt from these restrictions.

E. PRIVATE COLLECTING AND PERSONAL COLLECTIONS

Staff may not compete with the Museum in their personal collecting activities. CAT members and any other staff with decision-making authority over collections shall make an itemized disclosure of private collections in their own professional subject matter area. All such personal collections shall be itemized at the outset of the staff member's employment with the Museum and updated at the time of each subsequent personal acquisition. Periodic reviews of personal collections at the Museum shall also be undertaken at the discretion of the CAT, Director, or Vice President. When a personal collection or private collecting is determined to be at odds with the Museum's policies, ethical responsibilities, or goals and priorities; puts undue stress on Museum personnel or resources; or poses a safety or legal threat to the Museum, its visitors, or staff, that personal collection, or parts thereof, shall be removed at the owner's expense from the Museum, or the Museum will request that such personal collecting activities cease.

IV. ACQUISITIONS AND ACCESSIONS

A. DEFINITION OF TERMS

"Acquisition" includes any transaction by which good title to collection material is transferred to the Museum. Such transactions may include gifts, bequests, exchanges, purchases, salvage, or field collections.

"Accession" describes the formal acceptance of specimens, cultural items, or other materials into the Museum's permanent collection.

"Exchange" refers to the roughly equivalent, reciprocal transfer of materials between two or more parties.

“Incoming Gifts” involve transfers to the Museum where no materials or payment(s) are received in return for the item, and where the transfer of ownership and legal title to the Museum occurs during the donor’s lifetime.

“Bequests” refer to Incoming Gifts whereby ownership and legal title are transferred via the donor’s will after the donor’s death.

“Purchases” occur when the Museum buys an object through auction, dealer, or from a private individual or organization. Proof of payment is required to document legal title.

B. LAWS CONCERNING ACQUISITION

Specimens, cultural items, and other materials shall be acquired only when they have been collected, exported, and imported in full compliance with the laws and regulations of the country or countries of origin, the United States, and, where applicable, individual states of origin within the United States. Every reasonable effort must be made to ensure that these conditions are met and to document that title to these materials has been properly transferred to the Museum. The Museum will undertake reasonable efforts to keep up-to-date on the changing laws and regulations concerning collecting, ownership, and movement across political boundaries for specimens, cultural items, and other materials. Several types of permits are maintained and renewed by various units in CCR; the GFCC main office maintains and renews permits for the Collection Areas (e.g., US Fish and Wildlife permits for the possession of endangered species in the collection).

The CAT shall be responsible for exercising due diligence in the decision to acquire any item, including making a reasonable effort to acquire information into the item’s provenance and obtaining all necessary collecting, import, export, and transportation authorizations in writing prior to acquisition. The CAT shall also undertake a reasonable review of all materials brought into the Museum by students, honorary appointees, research associates, and other non-employees to ensure that the individual has appropriate authorizations (e.g., collecting permits, import/export permits, loan agreements, etc.) to collect, use, and possess such material.

C. CONDITIONS OF ACCEPTANCE

The Museum cannot accession specimens or other materials on which restrictions are placed that would prevent effective research examination, normal exhibition use, loan, or disposal in accordance with this Policy. The Museum also cannot accept materials on conditions that would require that they be placed on permanent or long-term exhibition, or that the collection of which they form a part shall be kept together permanently and/or displayed only as a discrete collection.

Materials can be accepted with the requirement that the Museum retain ownership for a negotiated period of time. Certain materials may be acquired by the Museum, but not accessioned, just as other materials may be accessioned but not acquired (e.g., see Section VIII.A).

Donors shall be informed prior to title transfer of the intended purpose for which their donation will be used, with the understanding that this purpose may change in the future as the Museum's needs and research methods evolve. A legal instrument of conveyance, in a form approved by the General Counsel's Office, setting forth an accurate description of the objects or materials involved and the precise condition of transfer must accompany all acquisitions for accession and must be kept on file at the Museum. All such documents must be signed by the legal owner, or their designated representative, and by appropriate Museum staff.

When accepting items that may be subject to copyright protection (e.g., photographs, personal papers, fine art), the CAT shall, as part of its due diligence responsibilities, make a good faith effort to document the copyright status and owner of the item. When reasonable, the CAT should obtain an assignment of the copyright to the Museum or a license to use the item for routine Museum purpose; such assignments and licenses must be recorded in a form approved by the Office of General Counsel.

D. PROCESS OF ACCESSIONING

Criteria for the acquisition and accession of collections shall be as specified in Appendix A to this Policy ("Criteria for Acquisitions, Accessions and Deaccessions"), and shall be reviewed at least every five (5) years.

All accessioning of materials into the collections shall be initiated by the responsible CAT and approved in accordance with the accessions criteria outlined in Appendix A. All accessions shall be documented in accordance with the applicable Collection Area Procedures and reported preferably quarterly but at least annually to the Director and the Collections Committee.

Accession Record

The "accession record" documents the Museum's legal title and acceptance of specimens, cultural items, or other materials into the permanent collection and the assignment of a unique Museum accession number. It includes paper and electronic records and shall be signed by the responsible CAT and permanently retained. In addition, it shall contain the original copy of the document of title (deed of gift, will, etc., or where impractical, a reference to the file containing the document of title); relevant correspondence; provenance information or history of ownership; any governmental permit, declaration, etc., which is necessary for the collection, possession, importation, exportation, or transport of the item(s); and any other documentation or material that may be important to the acquisition, legal ownership, or accession of the item or items. An

accession record and accession number may be linked to a single item or multiple items, depending on the number of items or specimens included in the accession.

Catalog Record

The “catalog record” documents the physical characteristics and intellectual significance of an individual specimen, item, or group of specimens or items that have been accessioned into the Museum’s collection. In general, a catalog record includes some or all of the following: unique catalog number; a description of the specimen or item; collection information; measurements; field notes and illustrations; a written summary of the material’s scientific or cultural significance; condition records; conservation reports; and loan records. A catalog record may also include additional scientific testing data (e.g., DNA sequence information, materials analysis reports, x-ray fluorescence analyses, etc.) and may include a variety of additional media including non-digital formats, digital formats, and such other formats as may develop over time.

E. FIELD COLLECTING

Direct acquisition during field research shall be conducted with the permission or agreement of and in accordance with the laws of the host state or country, by written agreement with a private landowner (in the case of collection on private lands), and/or by written agreement with an item’s creator or owner. A written memorandum of understanding or other agreement regarding the allocation, disposition, and use of field collections signed by the Vice President shall be sought and obtained, where applicable, prior to the field collecting. All agreements that impose obligations on the Museum for financial contributions, training, educational materials, or research facilities, shall be in writing and executed by the Vice President in consultation with the Office of General Counsel prior to commencement of fieldwork. Legal and financial provisions, appropriate to the discipline, shall be made for the transport of field collections to the Museum, and for the stewardship and care of these materials. Additional requirements may be described in the Collection Area Procedures.

F. INCOMING GIFTS AND BEQUESTS

All proposed gifts and bequests to the Museum are governed by the Museum’s Gift Acceptance Policy (or its equivalent). Under that policy, gifts of artifacts, specimens, or works of art intended to become part of the Museum’s permanent scientific collections are governed by the Museum’s Collections Management Policy (or its equivalent). Incoming gifts and bequests shall be documented by either a deed of gift or a specimen or item transfer form transferring title and possession. These documents shall identify the person who owns the donation (has legal title), warrant that the item or lot has been lawfully acquired and imported into the United States, and state that the donation is an unrestricted gift for the general purposes of the Museum. Any restrictions shall be approved in consultation with the Office of General Counsel and noted in the

deed of gift or specimen transfer form. Other communications (letter, e-mail) may be used to document the transfer of title and possession when necessary in the opinion of the Office of General Counsel and the appropriate CAT.

Upon notice of a proposed bequest or gift of an item or lot received by the Museum, Institutional Advancement (IA) or other Museum department, the relevant CAT shall be notified; the CAT will work with IA, as appropriate, to review the proposed bequest or gift, and correspond with the donor. The decision whether to accept or reject the item(s) shall be made in accordance with this Policy and the relevant Collection Area Procedures.

If an incoming gift or bequest includes money to support the care or curation of the item(s) or to support the Museum generally, IA must be notified as soon as possible and will be responsible for documenting the monetary portion of the gift or bequest, including documenting any restrictions on the use of the money.

G. ACQUISITION OF ANTIQUITIES

The term “antiquities” includes products of archaeological excavation or of archaeological discoveries, ethnographic items, or any other item designated by its country of origin as cultural property.

The term “country of origin” may mean “country of ultimate origin” and/or “country of intermediate origin” when the items in question have been recently transported across several international boundaries, and also when applied to items transported in the past and then deposited in an archaeological or historical context.

1. General Requirements

The Museum will not acquire or accession any antiquities that cannot be shown to the satisfaction of the Museum official(s) or committee responsible for its acquisition to have been exported legally from its country of origin or legally or scientifically excavated or recovered.

The Museum will refuse to acquire or accession antiquities in any case where the responsible Museum official(s) or committee has reasonable cause to believe that the circumstances of their recovery involved the recent unscientific or intentional destruction of sites or monuments.

2. Antiquities of Appreciable Fair Market Value

The provisions of Section G shall apply especially to antiquities of appreciable fair market value. The pedigrees of such items will be subjected to particular scrutiny. Regardless of value, however, no antiquity of any kind will be acquired or accessioned unless the responsible

Museum official(s) or committee is satisfied as to the legality of its exportation and the circumstances of its recovery.

3. Documentation Required

The Museum will not acquire or accession foreign antiquities except those that can be demonstrated to have left their country of origin before November 17, 1970. The same date shall apply to antiquities reasonably believed to have been illegally or unscientifically excavated within the United States. The responsible Museum official(s) or committee shall be entitled, however, to utilize the principles contained herein in determining whether to acquire any antiquity reasonably believed to have been properly exported or recovered before that date.

4. Return of Items

If the Museum acquires an antiquity that is later determined by the responsible Museum official(s) or committee to have been exported or recovered in violation of this Policy, or lacking the documentation required in paragraph 3 (“Documentation Required”) above, the Museum shall promptly return the item to the transferor or, whenever appropriate, to the government of the country of origin or other proper owner thereof, as the case may be, if such an entity can be determined.

H. PERIODIC REVIEW OF ACQUISITIONS AND ACCESSIONS

The Director shall at least annually review all acquisitions and accessions to ensure that the Museum is acting in accordance with the provisions of this Policy, and shall report annually on the review to the Trustees’ Collections Committee.

V. DEACCESSIONS AND DISPOSALS

Deaccessioning and disposal are a legitimate part of responsible collection management. Prudent collection management, including judicious evaluation, deaccessioning, and disposal of existing collections, is intended to refine and improve the quality and relevance of the collection with respect to the Museum’s mission and purpose. Deaccessioning and disposal occur for a variety of reasons, such as deterioration of collection items beyond usefulness; lack of adequate information; duplication or redundancy of collection material; insufficient relationship of collection items to the mission and goals of the Museum; repatriation; and selection for consumptive research or educational use. Such disposals may be through the transfer or discarding of specimens, cultural items, or other materials. In all cases, deaccession and disposal

of items and specimens from the permanent collection shall be solely for the advancement of the Museum's mission and in keeping with its public trust responsibilities.

A. DEFINITION OF TERMS

“Deaccession” means the process to approve and record the permanent removal of a specimen or item from the permanent collection.

“Disposal” includes any transaction by which collection material is physically transferred from the Museum to another institution, individual, or group, as well as discard. Disposal is the resulting action after a deaccession decision.

“Transfer” is the disposal of materials that have continuing scientific, exhibition, or significant financial value, and whose preservation and continued use over a long term is of significant benefit to society. Transfers may include gifts, exchanges, sales, or repatriations.

“Discard” is the destructive disposal of materials whose scientific, exhibition, or fair market value is minimal or absent, and thus continued future preservation is of little or no benefit to society.

“Scientific value” refers to the significance of material as a record of past research and/or for future research.

“Educational value” refers to the significance of the item in teaching or training any audience on natural history subjects.

“Exhibition value” may be based on aesthetic appeal, representing a typical or unusually fine example of its kind, artistic superiority for cultural items, or such other factors as may be pertinent in selecting material for display.

“Fair market value” shall be the price obtainable for a specimen, cultural item, or collection in public or negotiated private sale.

“Sales” involve payments to the Museum for transferred materials.

“Repatriations” refers to transfers that return materials to lineal descendants or cultural groups as may be required by law or as authorized under this Policy.

“Direct Care” shall include expenditures for Collections personnel, equipment, and supplies to manage collections. The Museum follows the American Alliance of Museum's definition of direct care, which is “an investment that enhances the life, usefulness or quality of a museum's collection.”

B. AUTHORITY

Criteria for the deaccession and disposal of specimens, cultural items, or other materials shall be as specified in Appendix A Section III of this Policy, and shall be reviewed at least every five (5) years.

The Trustees have formally empowered the Trustees' Repatriation Subcommittee, with assistance from the Center for Repatriation, responsible CAT, Directors of GFCC and NIRC, General Counsel's Office, Vice President, and President with the authority to make all decisions on behalf of the Museum regarding requests for repatriation as required by law and as authorized by this Policy.

Only the responsible CAT may initiate the deaccession process, except in the case of a formal repatriation request, which shall be initiated within the Museum by the Center for Repatriation. The deaccession and disposal of specimens, cultural items, or other materials shall be initiated by the responsible CAT and approved in accordance with the Deaccessions Criteria, except for repatriations for which the Repatriation Subcommittee has approved separate written procedures. Before any approval is given, the Museum shall ensure that deaccessioning will comply with ethical standards and will not violate the terms of any applicable laws or regulations, gift, bequest, permit, or agreement.

C. TRANSFERS

In certain cases, the stated reason for deaccessioning will control the transfer (e.g., repatriation), in all others, the following transfers are recommended in the following order:

1. Exchange with another museum or educational institution that qualifies as a public charity under the United States Internal Revenue Code.
2. A gift to a public charity.
3. A public sale with sufficient prior notice to potentially interested public charities. Preference shall be given to placing material where such specimens or items could continue to be accessible and be held in the public trust.

1. Exchanges

The formal reciprocal transfer of collection material between two or more institutions, or institution and an individual, often serves to advance the research, education, or exhibition programs of both parties. Such exchanges increase the probability of preserving materials for future societal benefit. All exchanges must be made per written exchange agreements.

2. Gifts

Study, naming, or reporting on permanent collection materials by a scientist adds to the scientific value of that material. In consideration, it is customary in some disciplines for scientists who borrow biological or geological specimens to retain some duplicate examples for the collection of their institution. Such mutual “gifts” of specimens usually involve modest fair market values. All such transactions shall be in keeping with the traditions of the scientific discipline involved.

3. Sales

If, in accordance with the Deaccessions Criteria, it is determined that certain collection materials no longer serve the Museum’s mission and are no longer needed for the research, education, and exhibition programs of the Museum, then these materials may be sold, subject to this Policy and the following guidelines.

- a. **Goal of Sales.** The preferred type of sale, whenever an appropriate price can be obtained, is to another museum or other educational institution that qualifies as a public charity where the materials will continue to be accessible and held to benefit the public. If this is not possible, then the sale, whenever practicable, shall be via public auction or the public market place.
- b. **Ethics of Sales.** There shall be no private sales of reference materials to staff members, the Trustees, or their representatives or immediate family members. In the event of public sale, such individuals shall be eligible, as any other private individuals, to bid on offered items, provided they have no special knowledge or advantage concerning the sale.
- c. **Method of Sales.** Negotiated private sales, public auction, sealed bidding, or open bidding over a period of time are acceptable options, provided that the availability of such material for sale has been given publicity aimed at the appropriate audience of potential purchasers. In all cases of items offered for sale, a reserve price may be established in advance, or all offers rejected if appropriate staff of the Museum, as determined by the Deaccessions Criteria, determine that such action is advisable.
- d. **Application of Proceeds.** All funds received from the sale of permanent collection materials, net of selling costs, shall be placed in the Museum Collections Fund functioning as endowment (“Museum Collections Fund”), a Board-designated fund.

i. Investment and Allocation of Proceeds. The Museum Collections Fund shall be held and invested as a part of the Museum’s long-term investment portfolio, generally known as the “endowment.” Each year, in accordance with the Trustee-approved spending policy, an amount equal to the Museum Collections Fund’s pro rata share of the endowment’s earnings and appreciation shall be credited to the Museum Collections Fund’s associated spending fund (“Museum Collections Spending Fund”).

ii. Authorized Use of Proceeds

Museum Collections Spending Fund. The Museum Collections Spending Fund shall be used only for the acquisition or direct care of collections. Such use includes support for the operations of the Collections Center as approved by the Vice President and allocated in the Museum’s annual operating budget; other uses of such funds may be recommended by the CATs and the Director, subject to the approval of the Vice President.

Museum Collections Fund. The Museum Collections Fund shall be used only for the acquisition or direct care of collections. Any use of the Museum Collections Fund other than as described in Section 3.d.i shall be approved by the Vice President, President, and the Trustees.

4. Repatriations

a. Introduction

i. Purpose: The purpose of the Repatriation Policy is to set out principles and policies to facilitate and expedite the respectful repatriation of Human Remains and Collection Items from the Field Museum to Lineal Descendants, Cultural Groups, and other Appropriate Requestors.

ii. Authority: Under Illinois law, the Museum’s Board of Trustees (“Board”) has a fiduciary obligation to protect and preserve the Museum’s collections. While Museum staff carry out the day-to-day operations of the Museum, the Board is responsible for establishing policies and overseeing the governance of the Museum’s collections. The Board has delegated authority to Museum staff, primarily through the Center for Repatriation, Tribal Relations, and Provenance Research (“the Center”), with the oversight of the Collections Committee of the Board, to make decisions, consistent with this Policy and relevant laws, regarding repatriations under the Native American Graves

Protection and Repatriation Act (NAGPRA), as well as repatriations and repatriation-related transfers that fall outside of NAGPRA. All other transfers and deaccessions of Collection Items are overseen by the Board as detailed elsewhere in the Collections Management Policy.

b. Applicability

The Repatriation Policy is intended to promote consistency and is applicable to the Museum as a whole, including all departments and collections areas of the Museum.

c. Principles

- i. Importance of repatriation:** The Field Museum acknowledges respectful and expeditious Repatriation of Human Remains and certain Collection Items as a fundamental and necessary step to respecting and promoting the inherent rights of all peoples and to establishing and/or fostering relationships with communities around the world, especially Indigenous Peoples.
- ii. Consultation:** The Field Museum is committed to meaningful and mutually respectful Consultation with Lineal Descendants, Cultural Groups, and other Appropriate Requestors. On the part of the Museum, respectful Consultation includes acknowledgement and respect for sovereignty and cultural and religious practices and knowledge, as well as the development and maintenance of mutual trust through transparent communication that is also respectful of Confidential Information.
- iii. Accessibility:** The Museum is committed to providing reasonable access to Human Remains, Collection Items, and associated documentation to Authorized Representatives through fair, transparent, and effective mechanisms subject to the requirements of NAGPRA and the Museum's access procedures.
- iv. Compliance:** Because it receives federal funding, the Museum is subject to the Native American Graves Protection and Repatriation Act, 25 U.S.C. 3001, *et seq.*, and associated regulations promulgated by the Department of the Interior (NAGPRA). The Museum shall comply with NAGPRA and any other applicable laws on repatriation. All repatriation requests by Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations recognized by NAGPRA with respect to Human Remains, Associated and Unassociated

Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony shall be made in accordance with the requirements of NAGPRA and in keeping with the spirit of that law.

- v. **Requests for Repatriations or returns that fall outside of NAGPRA** (for instance, requests by international requestors or for items that are not NAGPRA-eligible) shall be considered on a case-by-case basis. Such decisions shall be consistent with this Policy and with the Museum’s other legal, fiduciary, and ethical obligations.

- vi. **Prioritization of returns to communities over nation-states:** The Museum holds individual and community rights to Human Remains and certain Collection Items paramount to those of nation-states, but also recognizes that, in some cases, nation-states may be the appropriate stewards of Human Remains and Collection Items.

- vii. **Care and treatment:** The Field Museum is committed to ethical and respectful care and culturally appropriate treatment of Human Remains and Collection Items stewarded by the Museum. The Museum recognizes that culturally appropriate treatment must derive from Consultation with Lineal Descendants and Cultural Groups subject to the Museum’s care procedures.

d. **NAGPRA**

i. **Statement on Language**

The Field Museum acknowledges that the use of certain language within this policy and the accompanying procedures may be considered offensive or non-inclusive. As a steward of Human Remains and Cultural Items, the Museum recognizes that some terms are not all-inclusive or appropriate in all cases.

While some of these terms may still be utilized, they will be applied broadly and alternative terms may be substituted on a case-by-case basis. For the purposes of legal clarity and consistency with NAGPRA, this policy uses terms such as “Associated and Unassociated Funerary Objects,” “Human Remains,” and “Objects of Cultural Patrimony.” Out of respect to communities and their ancestors, Human Remains will always be referred to separately while other NAGPRA categories may be commonly referred to as “Cultural Items.”

Definitions: A majority of the following definitions are taken directly from

NAGPRA (43 C.F.R. §10.2) and are included here for ease of reference.

“Authorized Representative” means an individual officially designated by a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization as responsible for matters relating to repatriation under NAGPRA.

“Confidential Information” is any information shared by a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization during the Consultation process regarding Native American Traditional Knowledge and places that have traditional cultural significance, including the locations of sacred sites, graves, and cemeteries, and specific information shared by a consulting entity, including the Museum, that is identified as confidential by a Consulting Party.

“Consultation” or “Consult” means the exchange of information, open discussion, and joint deliberations made between all parties in good faith and in order to seek, discuss, and consider the views of all parties; strive for consensus, agreement, or mutually acceptable alternatives; and enable meaningful consideration of the Native American Traditional Knowledge of Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations.

“Consulting Party” means any Lineal Descendant and any Indian Tribe or Native Hawaiian Organization with potential cultural affiliation, as well as the Museum.

“Cultural Affiliation” means there is a reasonable connection between Human Remains or Cultural Items and an Indian Tribe or Native Hawaiian Organization based on a relationship of shared group identity. Cultural Affiliation may be identified clearly by the information available or reasonably by the geographical location or acquisition history of the Human Remains or Cultural Items.

“Cultural Item” means a Funerary Object, Sacred Object, or Object of Cultural Patrimony according to the Native American Traditional Knowledge of a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization.

“Custody” means having an obligation to care for the object or item but not a sufficient interest in the object or item to constitute Possession or Control. In general, Custody through a loan, lease, license, bailment, or other similar arrangement is not a sufficient interest to constitute Possession or Control, which resides with the loaning, leasing, licensing, bailing, or otherwise

transferring museum or Federal agency.

“Funerary Object” means any object reasonably believed to have been placed intentionally with or near Human Remains. A Funerary Object is any object connected, either at the time of death or later, to a death rite or ceremony of a Native American culture according to the Native American Traditional Knowledge of a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization. This term does not include any object returned or distributed to living persons according to traditional custom after a death rite or ceremony. Funerary Objects are either Associated Funerary Objects or Unassociated Funerary Objects.

“Associated Funerary Object” means any Funerary Object related to Human Remains that were removed and the location of the Human Remains is known. Any object made exclusively for burial purposes or to contain Human Remains is always an Associated Funerary Object regardless of the physical location or existence of any related Human Remains.

“Unassociated Funerary Object” means any Funerary Object that is not an Associated Funerary Object and is identified by a preponderance of the evidence as one or more of the following:

1. related to Human Remains but the Human Remains were not removed, or the location of the Human Remains is unknown;
2. related to specific individuals or families;
3. removed from a specific burial site of an individual or individuals with Cultural Affiliation to an Indian Tribe or Native Hawaiian Organization; or
4. removed from a specific area where a burial site of an individual or individuals with Cultural Affiliation to an Indian Tribe or Native Hawaiian Organization is known to have existed, but the burial site is no longer extant.

“Human Remains” means any physical part of the body of a Native American individual. This term does not include Human Remains to which a museum or Federal agency can prove it has a right of possession. Human Remains reasonably believed to be comingled with other materials (such as soil or faunal remains) may be treated as Human Remains. Human Remains incorporated into a Funerary Object, Sacred Object, or Object of Cultural Patrimony are considered part of the Cultural Items rather than Human Remains. Human Remains incorporated into an object or item that is not a

Funerary Object, Sacred Object, or Object of Cultural Patrimony are considered Human Remains.

“Indian Tribe” means any Tribe, band, nation, or other organized group or community of Indians, including any Alaska Native village (as defined in, or established pursuant to, the Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq.)), recognized as eligible for the special programs and services provided by the United States Government to Indians because of their status as Indians by its inclusion on the list of recognized Indian Tribes published by the Secretary under the act of November 2, 1994 (25 U.S.C. 5131).

“Lineal Descendant” means a living person tracing ancestry, either by means of traditional Native American kinship systems, or by the common-law system of descent, to a known individual whose Human Remains, Funerary Objects, or Sacred Objects are subject to NAGPRA; or a living person tracing ancestry, either by means of traditional Native American kinship systems, or by the common-law system of descent, to all the known individuals represented by commingled Human Remains.

“Native American Traditional Knowledge” means knowledge, philosophies, beliefs, traditions, skills, and practices that are developed, embedded, and often safeguarded by or confidential to individual Native Americans, Indian Tribes, or the Native Hawaiian Community. Native American Traditional Knowledge contextualizes relationships between and among people, the places they inhabit, and the broader world around them, covering a wide variety of information, including, but not limited to, cultural, ecological, linguistic, religious, scientific, societal, spiritual, and technical knowledge. Native American Traditional Knowledge may be, but is not required to be, developed, sustained, and passed through time, often forming part of a cultural or spiritual identity. Native American Traditional Knowledge is expert opinion.

“Native Hawaiian Organization” means any organization that: serves and represents the interests of Native Hawaiians, who are descendants of the Indigenous people who, before 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawai’i; has as a primary and stated purpose the provision of services to Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has expertise in Native Hawaiian affairs, and includes, but is not limited to: The Office of Hawaiian Affairs established by the constitution of the State of

Hawai'i; Native Hawaiian organizations (including 'ohana) who are registered with the Secretary of the Interior's Office of Native Hawaiian Relations; and Hawaiian Homes Commission Act (HHCA) Beneficiary Associations and Homestead Associations as defined under 43 CFR 47.10.

“Object of Cultural Patrimony” means an object that has ongoing historical, traditional, or cultural importance central to a Native American group, including any constituent sub-group (such as a band, clan, lineage, ceremonial society, or other subdivision), according to the Native American Traditional Knowledge of an Indian Tribe or Native Hawaiian Organization. An Object of Cultural Patrimony may have been entrusted to a caretaker, along with the authority to confer that responsibility to another caretaker. The object must be reasonably identified as being of such importance central to the group that it cannot or could not be alienated, appropriated, or conveyed by any person, including its caretaker, regardless of whether the person is a member of the group, and must have been considered inalienable by the group at the time the object was separated from the group.

“Possession” or “Control” means having a sufficient interest in an object or item to independently direct, manage, oversee, or restrict the use of the object or item. A museum or Federal agency may have possession or control regardless of the physical location of the object or item. In general, custody through a loan, lease, license, bailment, or other similar arrangement is not a sufficient interest to constitute possession or control, which resides with the loaning, leasing, licensing, bailing, or otherwise transferring museum or Federal agency.

“Repatriation” means a museum or Federal agency relinquishes Possession or Control of Human Remains or Cultural Items in a holding or collection to a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization.

“Sacred Object” means a specific ceremonial object needed by a traditional religious leader for present-day adherents to practice traditional Native American religion, according to the Native American Traditional Knowledge of a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization. While many items might be imbued with sacredness in a culture, this term is specifically limited to an object needed for the observance or renewal of a Native American religious ceremony.

ii. Implementation

- a. Request types and typical review process:* All of the following NAGPRA-related request types shall be directed to the NAGPRA Director (see Section (e) below regarding non-NAGPRA requests). For each request, the NAGPRA Director or their designee shall complete a reasonable assessment of the facts pursuant to NAGPRA.

NAGPRA requests for Human Remains and Associated Funerary Objects are Repatriation requests from Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations, for Human Remains and Associated Funerary Objects pursuant to NAGPRA. Such a request for which a Notice of Inventory Completion has been published in the Federal Register shall be deemed approved if no competing requests are received. Once a Notice of Inventory Completion has been published, the Museum has an affirmative obligation to Repatriate the Human Remains and/or Associated Funerary Objects to the requesting Lineal Descendant, Indian Tribe, or Native Hawaiian Organization identified in the Notice absent competing requests. A reasonable assessment of the facts will have occurred prior to the publication of the Notice, which shall be approved by the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. No further assessment or approval is required, but notification of the Repatriation shall be provided to the Collections Committee at its next meeting.

NAGPRA requests for Cultural Items are Repatriation requests from Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations for Unassociated Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony, pursuant to NAGPRA. Such requests shall generally be decided on a case-by-case basis, upon the review and recommendation of the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. Notification of the Repatriation shall be provided to the Collections Committee at its next meeting.

Repatriation-related outgoing transfer requests are requests from Lineal Descendants, Indian Tribes, Native Hawaiian Organizations, other museums or institutions, or Federal agencies for the transfer of Possession or Control and/or Custody of Human Remains and/or Cultural Items from the Field Museum to another entity for the purpose of Repatriation.

Transfer requests submitted by Indian Tribes and Native Hawaiian Organizations for Human Remains and/or Associated Funerary Objects with no Lineal Descendants and no Indian Tribes or Native Hawaiian Organizations with Cultural Affiliation for which a Notice of Proposed Transfer or Reinterment has been published in the Federal Register shall be deemed approved if no repatriation requests are received. A reasonable assessment of the facts will have occurred prior to the publication of the Notice, which shall be approved by the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. No further assessment or approval is required, but notification of the transfer must be provided to the Collections Committee at its next meeting.

All other repatriation-related outgoing transfer requests shall be decided on a case-by-case basis, upon the review and recommendation of the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President.

Repatriation-related incoming transfer requests are requests from Lineal Descendants, Indian Tribes, Native Hawaiian Organizations, other museums or institutions, or Federal agencies for temporary transfer of custody of Human Remains and/or Cultural Items to the Field Museum from another entity for the purpose of Repatriation. Such requests shall be decided on a case-by-case basis by the NAGPRA Director and Area Curator(s) and Collection Manager(s).

- b. Additional Review:* Select NAGPRA Repatriation requests may require additional review, as determined by the President, due to factors including, but not limited to, the size of the request or especially sensitive ethical or political concerns. Such requests shall be decided by the Collections Committee, upon the review and recommendation of the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. In extraordinary circumstances, the matter may be elevated to the full Board of Trustees if the President and Chair of the Collections Committee deem it necessary.
- c. Denied NAGPRA Requests:* Should the Museum decide for any reason (e.g., lack of category fit, lack of cultural affiliation, etc.) to deny a request for repatriation under NAGPRA, the request shall be reviewed

by the Collections Committee, and the Collections Committee shall decide whether such decision was made in error and whether the repatriation should proceed. The Collections Committee's decision will be based on the information and recommendations provided by the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. The Collections Committee may request additional information from Museum staff or consult with outside experts.

d. Additional Responsibilities:

The Center holds primary responsibility for facilitation of the Repatriation process, in addition to repatriation-related Consultation and transfers. The Center and other Museum staff involved in Repatriation matters are responsible for the fair and objective consideration, assessment, and determination of these requests.

The Collections Committee is responsible for oversight of the Museum's repatriation activities.

General Counsel shall provide legal advice as needed.

The President may participate in Consultation as appropriate.

The President or their designee is responsible for reviewing and responding to complaints and appeals based on procedural violations of the Repatriation Policy; this does not include disagreements about a decision or the outcome of a process, provided the requirements of this Policy have been substantially met.

Government Affairs staff may participate in Consultation and other repatriation activities as appropriate.

The Tribal Liaison may participate in Consultation and informal mediation as appropriate.

All of the Museum's Center Directors are responsible for ensuring that all Human Remains and potential Cultural Items in the collections for which they are responsible are reported to the Center for Repatriation, Tribal Relations, and Provenance Research. Center Directors and Section Heads, or their delegates, must work in cooperation with the Center for Repatriation, Tribal Relations, and Provenance Research and Area

Collection Manager(s) to determine and complete the appropriate action needed with respect to these Human Remains and potential Cultural Items pursuant to the Repatriation Policy and Procedures.

e. Procedures: The Museum must maintain and document internal procedures for NAGPRA requests, which shall adhere to the principles and policies set forth in this document. These procedures must address the following steps at a minimum:

1. Consultation
2. Assessment and Determinations
3. Physical Return
4. Stewardship Agreements
5. Conflict Resolution
6. Repatriation-Related Transfers
7. Implementation Plan

e. Non-NAGPRA

i. Statement on Language

The Field Museum acknowledges that the use of certain language within this policy and the accompanying procedures may be considered offensive or non-inclusive. As a steward of human remains and items from global contexts, the Museum recognizes that some terms are not all-inclusive or appropriate in all cases. While some of these terms may still be utilized, they will be applied broadly and alternative terms may be substituted on a case-by-case basis. For purposes of institutional clarity and consistency, the policy uses the term “Collection Items.” This term reflects the current status of cultural and natural resources that are held in the Field Museum’s collections, or are otherwise under the Field Museum’s control, and is not intended to diminish the significance of these items or the relationship between these items and Lineal Descendants, Cultural Groups, or other Appropriate Requestors.

Definitions

“Appropriate Requestor” means any individual or entity with a reasonable status to make a request under this Policy. Appropriate Requestors may include, but are not limited to, governments, arms of governments, or entities

acting on behalf of source communities.

“Authorized Representative” means an individual officially designated by a Lineal Descendant, Cultural Group, or other Appropriate Requestor as responsible for matters relating to repatriation under the Repatriation Policy.

“Collection Items” means cultural and natural resources currently held in the Field Museum’s collections, or otherwise under the Field Museum’s control, that have cultural, historical, or religious importance to a descendant community or other Appropriate Requestor, and/or problematic collection or acquisition histories. Whether Collection Materials are eligible for return will be assessed under the criteria provided in Section 4.e.ii.c.

“Confidential Information” is any information shared by a Lineal Descendant, Cultural Group, or other Appropriate Requestor during the Consultation process regarding Traditional or Community Knowledge and places that have traditional cultural significance, including the locations of sacred sites, graves, and cemeteries, and specific information shared by a consulting entity, including the Museum, that is identified as confidential by a Consulting Party.

“Consultation” or “Consult” means the exchange of information, open discussion, and joint deliberations made between all parties in good faith and in order to seek, discuss, and consider the views of all parties; strive for consensus, agreement, or mutually acceptable alternatives; and enable meaningful consideration of the Traditional or Community Knowledge of Lineal Descendants, Cultural Groups, and other Appropriate Requestors.

“Consulting Party” means any Lineal Descendant and any Cultural Group or Appropriate Requestor with potential cultural affiliation or another reasonable connection.

“Cultural Affiliation” means there is a reasonable connection between Human Remains or Collection Items and a Cultural Group based on a relationship of shared group identity.

“Cultural Group” means a coherent population of individuals that share a common culture, such as a First Nation, tribe, or clan.

“Funerary Object” means any object reasonably believed to have been placed intentionally with or near Human Remains or created for the purpose of a

funerary practice or rite.

“Human Remains” means any physical part of the body of an individual. This term does not include human remains that were or may reasonably be determined to have been freely given or naturally shed from the individual from whose body the material was obtained.

“Lineal Descendant” means a living person tracing their ancestry, either by means of their community’s traditional kinship systems, or other relevant system of descent, to a known individual whose Human Remains or Collection Items are subject to the Repatriation Policy.

“Repatriation” means the act or process of returning Human Remains or Collection Items to Lineal Descendants, Cultural Groups, or other Appropriate Requestors.

“Traditional” or “Community Knowledge” means knowledge, philosophies, beliefs, traditions, skills, and practices that are developed, embedded, and often safeguarded by or confidential to Indigenous Peoples or other cultural group or community. Traditional or Community Knowledge contextualizes relationships between and among people, the places they inhabit, and the broader world around them, covering a wide variety of information, including, but not limited to, cultural, ecological, linguistic, religious, scientific, societal, spiritual, and technical knowledge. Traditional or Community Knowledge may be, but is not required to be, developed, sustained, and passed through time, often forming part of a cultural or spiritual identity.

ii. Implementation

- a. ***Request types and typical review process:*** All of the following request types shall be directed to the Center, care of the CCR Vice President’s Office for assignment to either the NAGPRA Director or Provenance Research Director. For each request, the Center’s staff shall complete a reasonable assessment of the facts relevant to the request.

Non-NAGPRA requests for Human Remains and Associated Funerary Objects are Repatriation requests from Lineal Descendants, Cultural Groups, and other Appropriate Requestors for Human Remains and/or Associated Funerary Objects that are made not pursuant to NAGPRA. Such requests shall generally be decided by the Collections

Committee on a case-by-case basis, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President.

Non-NAGPRA requests for Collection Items that are not Associated Funerary Objects are Repatriation requests from Lineal Descendants, Cultural Groups, and other Appropriate Requestors for Collection Items that are made not pursuant to NAGPRA. Such requests shall generally be decided by the Trustees on a case-by-case basis, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Directors of GFCC and NIRC, Office of General Counsel, Vice President, and President.

Repatriation-related outgoing transfer requests are requests from Lineal Descendants, Cultural Groups, other museums or institutions, or Federal agencies for the transfer of Possession or Control and/or Custody of Human Remains and/or Collection Items from the Field Museum to another entity for the purpose of Repatriation. Such requests shall generally be decided by the Collections Committee on a case-by-case basis, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President.

Repatriation-related incoming transfer requests are requests from Lineal Descendants, Cultural Groups, other museums or institutions, or Federal agencies for temporary transfer of Human Remains and/or Collection Items to the Field Museum from another entity for the purpose of Repatriation. Such requests shall be decided on a case-by-case basis by the appropriate Center director (as assigned by the VP), Area Curator(s), and Collection Manager(s).

- b. Additional Review:* Select non-NAGPRA Repatriation requests that are normally decided by the Collections Committee may require additional review, as determined by the President or Chair of the Collections Committee, due to factors including, but not limited to, the size of the request or especially sensitive ethical or political concerns. Such requests shall be decided by the Board, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President,

President, and Collections Committee.

- c. Assessment of non-NAGPRA requests* shall require consideration of the following criteria:
1. Standing of the Lineal Descendant, Cultural Group, or other Appropriate Requestor to make a request pursuant to the Policy;
 2. Request made by an Authorized Representative of the Lineal Descendant, Cultural Group, or other Appropriate Requestor;
 3. Cultural Affiliation or other reasonable connection established between the requestor and the requested individuals or items;
 4. Degree of cultural, historical, or religious significance;
 5. Collection and acquisition history including how the individuals or items were separated from the individual or community to whom they belonged;
 6. Likelihood of competing requests; and
 7. Other considerations as appropriate.

d. Additional Responsibilities:

The Center holds primary responsibility for facilitation of the Repatriation process, in addition to repatriation-related Consultation and transfers.

The Center and other Museum staff involved in Repatriation matters are responsible for the fair and objective consideration, assessment, and determination of these requests.

The Collections Committee is responsible for the oversight of the Museum's Repatriation activities.

General Counsel shall provide legal advice as needed.

The President may participate in Consultation as appropriate.

The President or their designee is responsible for reviewing and responding to complaints and appeals based on procedural violations of the Repatriation Policy; this does not include disagreements about a decision or the outcome of a process, provided the requirements of this Policy have been substantially met.

Government Affairs staff may participate in Consultation and other repatriation activities as appropriate.

The Tribal Liaison may participate in Consultation and informal mediation as appropriate.

All of the Museum's Center Directors are responsible for ensuring that all Human Remains in the collections for which they are responsible are reported to the Center for Repatriation, Tribal Relations, and Provenance Research. Center Directors and Section Heads, or their delegates, must work in cooperation with the Center for Repatriation, Tribal Relations, and Provenance Research and Area Collection Manager(s) to determine and complete the appropriate action needed with respect to these Human Remains pursuant to the Repatriation Policy and Procedures.

b. *Procedures:* The Museum must maintain internal procedures for non-NAGPRA requests, which shall adhere to the principles and policies set forth in this document. These procedures must address the following steps at a minimum:

1. Consultation
2. Assessment and Determinations
3. Physical Return
4. Stewardship Agreement
5. Conflict Resolution
6. Repatriation-Related Transfers
7. Implementation Plan

f. Revisions

Revisions to the Repatriation Policy and Procedures will be completed in compliance with the Museum's Collections Management Policy.

D. DISCARD

Removal or culling of undocumented, surplus, or deteriorated specimens, essentially of no scientific, exhibition, or fair market value from the collection is an acceptable practice. Such materials shall be offered first to the Learning Center teaching collections. If such materials are not needed for the teaching collections, then they may be sold at modest prices (less than \$250), given to appropriate educational institutions for use in teaching activities, or if no

alternative exists, be discarded. All monies obtained from sale of such items shall be credited to the Museum Collections Fund. If materials have an individual fair market value of less than \$250, the above procedure is sufficient. Deaccessioning of more valuable materials shall follow the deaccessions criteria in Appendix A.

E. PERIODIC REVIEW OF DEACCESSIONS AND DISPOSALS

The GFCC Director shall at least annually review all deaccessions from the collection to ensure that the Museum is acting in accordance with the provisions of this Policy, and shall report annually on the review to the Trustees' Collections Committee.

VI. LOANS

A. OUTGOING LOANS FROM THE COLLECTION

1. Purpose

This section establishes policies and guidelines governing the temporary physical transfer of materials from the collection to another institution for use in research, education, or exhibition. No transfer of title is involved in such loans. All of the provisions for loans shall be consistent with the legal and ethical constraints provided in Section III above and the Museum's *Code of Ethics and Conflict of Interest* policy.

2. Background on Loans and Use of Collections by Others

The Museum and its staff have a continuing obligation to permit use of these materials for the advancement and dissemination of knowledge through research, education, and exhibition.

Balanced against the obligation to permit effective and appropriate uses of materials is the need to preserve and protect the collections in the Museum's custody as well as to be responsive to cultural sensitivities.

Access to the collections and associated data is provided in several ways: by replying to reasonable requests for scientific data, by supplying space and facilities for visiting scholars to study the Museum's collections whenever feasible, and by lending materials to institutions for appropriate purposes.

Loans for purposes of exhibition present special features and are treated separately from those for research and education.

3. Authority

Decisions concerning loans of materials from the collection shall be made by the responsible CAT as outlined in the associated Collection Area Procedures.

4. Outgoing Loans for Research and Education

- a. Restrictions on Loans.** The Museum will undertake loan transactions with appropriate museums and higher educational and cultural institutions in any country of the world. Loans are made to institutions, not to individuals. Loans for use by students, postdoctoral fellows, and other non-permanent staff will be made to institutions, under the supervision of the student's major advisor or other appropriate institutional officer.

Loans requested from the Museum for research or educational purposes usually will be made to any recognized institution, provided the following minimum conditions are met:

1. the institution has a recognized professional staff member in an appropriate field
2. the institution has adequate facilities (as deemed by the loaning CAT) to safely and securely store collection items for the duration of the loan
3. the reputation of the institution and qualifications of the professional staff are such as to ensure adequate care of the materials while on loan
4. political or economic circumstances do not suggest unreasonable hazard to the material
5. the materials are not being studied by staff or students at the Museum and are not needed for display or educational programs at the Museum during the proposed loan period
6. preparing, conserving, packing and shipping the loan will not place an unreasonable logistical or financial burden on the Museum, or, alternatively, the borrower is willing to pay the costs
7. the materials are not so fragile, rare, or valuable that the risks in handling, shipping, or extended display are unacceptable. The determination of acceptable risk shall be made by the CAT in consultation with a museum conservator or preparator, as appropriate
8. the institution requesting the loan honors loan requests from the Museum
9. the institution does not already have outstanding or expired loans from

the Museum. Under such circumstances, the expired loans must be returned to the Museum, or an official loan extension must be granted by the Museum prior to the new loan request being considered.

- b. Terms of Loans.** All loans shall be made pursuant to written documentation maintained by each collection area. Most loans will be made initially for a period of one (1) year or less, and shall be in accordance with the applicable Collection Area Procedures. The period may be extended if such an extension will contribute more to the advancement and dissemination of knowledge than return of the material to the Museum. Extension of each loan period shall be subject to at least annual written review by the appropriate CAT. All outstanding loans made by each collection area will be reviewed annually by the CAT. Loans of concern will be brought to the attention of the Center Director(s) for discussion and determination of action.
- c. Modes of Study of Loaned Materials.** Customary and usual methods of study in the particular discipline may be applied to materials on loan for scientific study. If such studies require any destruction or alteration of the materials, written permission for this must be obtained in advance, based upon the approval of the responsible CAT. The Museum attempts to ensure permanent preservation of collection materials, their highest and best use in scholarly activities and public education, and to promote the advancement of human knowledge. Conflicts among these goals in relation to individual materials shall be decided on a case-by-case basis in accord with professional standards of the discipline involved.
- d. Inappropriate Handling of Loans.** If the borrowing institution or researcher engages in inappropriate care for the loaned material, the researcher may be asked to return the loan before the end date of the loan period, may be prohibited from taking loans in the future, and may be banned from onsite access to research materials at the Field Museum based on the circumstances of the mishandling of the collections. Examples of inappropriate care include, but are not limited to, destructive sampling without prior written permission from the Museum, removal of catalog numbers, retention of loans beyond the due date, sub-loans to other individuals or institutions without the Museum's knowledge or approval, or refusal to pay for return shipping due to expense. Determination of such consequences will be at the discretion of the CAT with review by the relevant Center Director(s) and the General Counsel's Office.
- e. Special Restrictions on Loans for Educational Purposes.** Loans for educational purposes, especially those that would involve students handling the material,

rarely will be made by the Museum. Loans of material for short-term use in graduate training or demonstration use by specialists in that discipline will be approved when, in the opinion of the responsible CAT, threat of danger to the collection materials is minimal.

5. Outgoing Loans for Exhibition

- f. Restrictions on Loans.** All of the qualifications and criteria listed in paragraph 4.1 above apply generally to loans for exhibition purposes. Additional considerations apply to exhibition loans and may modify the above criteria.

The borrowing institution must provide adequate security and appropriate environmental conditions for the borrowed collection materials. Where appropriate, this may be in the form of guards, insurance, various levels of protective display cases, and/or building, room or display-case level environmental controls as determined by the responsible CAT in consultation with a museum conservator, as appropriate. Requirements for the loan will be stipulated and agreed to in writing by the borrowing party prior to the transfer of loan items from collection.

Loans may be withdrawn if the borrowing party fails to implement agreed-upon requirements for the loan, or where a previously unsuspected agency of damage (e.g., roof leak, armed conflict, insect infestation) that could adversely affect the condition of loaned collections becomes apparent.

Loans will not be made in any situation in which the responsible CAT has reasonable cause to believe that the exhibit for which the materials are requested involves the support or promotion of an ethical position contrary to that held by the Museum.

Federally or internationally protected species will be transported with proper permits through the efforts of the Exhibitions Registrar, the appropriate Collection Area's Registrar (or equivalent), or the GFCC Main Office.

- g. Terms of Loans.** All exhibition loans shall be made pursuant to written documentation. While most exhibition loans are for relatively short periods ranging from a few months to a year, longer term loans are possible provided there is clear understanding as to the loan period. Extension of each exhibition loan period shall be subject to at least annual written review.

B. INCOMING LOANS

1. General Provisions

Incoming loans will be accepted only for research or exhibition purposes consistent with this Policy. All purposes and conditions for an incoming loan must be clearly documented in writing. The Museum will exercise the highest appropriate standards of care for all incoming loans. The condition of specimens and items will be thoroughly documented when received and prior to returning. Incoming loans shall be maintained separately from the Museum's collection.

The provisions regarding the acceptance of antiquities for exhibition loan or other purposes (Section IV.G.1) shall be taken into account.

2. Incoming Loans for Research

As outlined in the Collection Area Procedures, decisions concerning incoming loans of materials for research purposes shall be made by the relevant CAT in consultation with the CCR staff member requesting the loan and responsible for conducting the research.

3. Incoming Loans for Exhibition

- h.** Loans of materials for Museum exhibitions, either on the premises or as traveling exhibitions, shall be managed by the Museum's Exhibitions Department in accordance with Exhibitions Department policies and procedures, and in consultation with CCR staff as appropriate.

C. INTERNAL LOANS

Loans from the collection made to other departments within the Museum constitute in-house loans. These are made for exhibition, education, and research purposes. Prior to the transfer of any collection specimen or item to a requesting department, the responsible CAT and the requesting department shall document the intended use, location, and duration, and environmental, security or other relevant conditions of the loan. Outstanding internal loans shall be reviewed annually by the responsible CAT.

VII. OBJECTS IN CUSTODY

A. OBJECTS IN TEMPORARY CUSTODY

"Objects in temporary custody" are not owned by the Museum nor are they on loan for research

or exhibition, but are left temporarily at the Museum for purposes such as identification, attribution, or examination for possible purchase or gift. These items will be distinguished from other objects in the collection. The depositor shall sign a temporary receipt acknowledging the object(s) status. Such receipt shall be retained as a permanent record. Until they are returned to the depositor, these objects shall be tracked as outlined in the relevant CAPs. Objects in temporary custody should be kept only as long as necessary to complete the purpose for which they have been left at the Museum and should be returned promptly once such purpose is accomplished.

B. UNDOCUMENTED PROPERTY AND UNCLAIMED LOANS

“Undocumented property” includes those collection objects held by the Museum whose ownership cannot be determined by the Museum’s records.

“Unclaimed loans” includes those collection objects that have been abandoned by the lender.

Every reasonable effort shall be made to research the history of undocumented property and unclaimed loans to identify ownership or make contact with the lender. Undocumented property and unclaimed loans will be addressed in accordance with the Illinois Museum Disposition of Property Act, which provides specific notice requirements and authorizes a museum to apply conservation measures, acquire title to, or dispose of undocumented property or unclaimed loans if specified criteria are met. This Act also provides limitations on actions against a museum that follows its provisions, and allows a museum to recover its costs and expenses, including reasonable attorney’s fees, if a museum’s right under the Act is wrongfully challenged.

Claims for the return of undocumented property that may be subject to NAGPRA shall be processed under the presumptions and procedures set forth in that statute and following the repatriation policies set forth elsewhere in this Policy.

VIII. REGULATED COLLECTIONS

A. GOVERNMENT-OWNED COLLECTIONS

The Museum maintains collections that are accessioned but not acquired (i.e., the Museum does not claim title) only under circumstances where the collections are owned by a United States (federal, state, local or tribal agency) or foreign government, where by law, title cannot be transferred to the Museum. The Museum retains a right of possession to these collections pursuant to the specific terms of a permit or written agreement. These collections require the same approvals as any other accession. A copy of all applicable permits or agreements shall be permanently maintained in the accession file.

B. CONTROLLED SUBSTANCES

The Museum owns and maintains collections that are held pursuant to permits issued by the Department of Justice under the federal Controlled Substances Act. These permits are maintained by the Office of CCR, with assistance from the GFCC Main Office. CATs whose collections are subject to this Act are responsible for ensuring compliance with those procedures under the Act necessary to lawfully maintain controlled substances in the collections.

IX. DOCUMENTATION

The Museum's collection includes both the physical specimens/cultural items and their associated documentation. Accurate, complete, and timely documentation increases research opportunities and improves access and collections care. Collections documentation provides proof of ownership and accountability for objects held in the public trust. It should document significant collections-related decisions, activities, conservation treatments, and other information. The collection objects and associated documentation have the same legal status and therefore require a similar level of care and protection.

Collections activities such as acquisition, accession, analysis (both destructive and non-destructive), cataloging, inventory, access, public inquiry, research, loan, exhibition, conservation, and deaccession all result in data that are vital to the maintenance and use of the collections. These varied sets of information are recorded in a multitude of formats, both physical (files, ledgers, catalog card systems) and digital (databases, various file formats, digital media). A permanent record shall be maintained for acquisitions, accessions, deaccessions, loans, analysis, conservation treatments, use of the collection, and the location of all collections in the Museum's custody. The Museum will make available to authorized persons, including qualified researchers and scholars, and members of originating communities, materials relating to the collection unless that information is confidential or the records would suffer physical harm if handled. In the latter case, every effort should be made to prepare accurate facsimiles of fragile documents so that they can be examined without damage to the original.

X. COLLECTIONS MAINTENANCE AND CONSERVATION

Collections care is an active process oriented toward risk assessment, preventive maintenance, and conservation supporting the objective of long-term preservation of the collection. This care generally includes traditional maintenance, handling, inventories, object labeling, object housing

and support, and storage, general housekeeping, environmental control, interventive conservation, integrated pest management, emergency planning, mitigation and response, health and safety, security, and insurance. Specimen/cultural item preparation and conservation treatments (including pest management) shall adhere to applicable professional ethics and guidelines, and shall reflect the currently accepted methods and practices in the field. Treatments shall be undertaken only by qualified Museum personnel, within the limits of their area of expertise or by external agents approved of or identified by qualified Museum staff, including but not limited to the CAT.

A. RISK ASSESSMENT

“Risk Assessment” is the process of identification and evaluation of risk in order to prevent or minimize exposure to factors that may cause loss, damage, or deterioration of collections.

- i.** The Museum will endeavor to minimize and control the level of risk of loss or damage to collections through established collection management practices for collections items in storage, on display, and on loan. Staff must note and communicate situations that create the potential for damage or loss to collections, personal injury, or legal liability to the appropriate CAT or department, including the Office of CCR, Center Director(s), Protection Services, Facilities, General Counsel, etc.

B. PREVENTATIVE CONSERVATION

The Museum recognizes that preventive conservation measures are of paramount importance in meeting its professional obligation to preserve its collection. Effective preventive conservation measures are essential to, and are the most effective means of promoting, the long-term preservation of its collection. Preventive rather than interventive means will be recommended whenever they would best promote collections preservation.

1. Quarantine

Incoming materials will be physically isolated from the Museum’s collection pending inspection and treatment to reduce the risk of pest infestation or the introduction of toxic chemicals that could affect other collections.

2. Pest Management

The Museum endeavors to preserve its collection while ensuring a healthy and safe environment for staff, volunteers, and the public. To this end, the Museum follows an integrated pest management program (“IPM”) as a primary line of defense against infestations (insect, rodent, molds and other biological infestation) to reduce the need for chemical treatments. The IPM

program includes a proactive rather than a reactive approach to preventing pest infestations in the Museum's collection. IPM includes the use of good housekeeping techniques, regular monitoring of the collection, building and environs, identification of pest species, and treatment as required. When an infestation is identified, the item or specimen is isolated and treated in the safest manner possible. Preferred treatments include pesticides, temperature modification, and anoxic treatment. All treatments will be done in accordance with OSHA regulations. The Museum's Pest Committee shall be the conduit for pest monitoring, identification, development of responses to infestation, and promotion of best practices for reducing pest activity.

3. General Housekeeping

Good housekeeping is critical to maintaining a safe environment for collections and staff. Housekeeping includes but is not restricted to regular cleaning of storage, laboratory, workroom and exhibition spaces. Specimens and cultural items should be returned to the collection from laboratories and workspaces as soon as possible. Collection Managers should regularly check that no inactive specimens are kept in labs or other workspaces for prolonged periods.

Food and drink are not allowed in collections storage areas, laboratories, work areas housing collection objects, any room used to store collections documentation, or in exhibition galleries. Personal items not required for research or work purposes are not allowed in collections storage areas.

a. Environmental Controls

The collections' environment includes, but is not limited to, light, relative humidity, temperature, particulate matter, and volatile organic compounds. All collections and loans should be housed in an environment with parameters set at levels appropriate to their material and condition.

Conservators set the standards for each environmental parameter, which are implemented in consultation with Facilities, Planning and Operations ("FP&O") staff. Conservators and the responsible CAT in conjunction with FP&O staff monitor environmental conditions in collections storage, laboratories, workrooms, and with the Exhibitions Registrar for exhibition display spaces.

FP&O staff are responsible for providing and maintaining the means to achieve the set standards.

b. Housing and Support

Collection housing and support includes but is not restricted to collections storeroom structure, storage furniture, individual or collective object support, and collection organization and identification labeling. Housing is updated as

resources allow. Each collection area's Collection Area Procedures shall address the appropriate standards of object housing and support for their collection.

c. Handling, Moving, and Transport

When handling and movement of collections are necessary, handling and transport procedures specified by the collection area will be followed. Any damage to objects or their support or housing shall be reported to the responsible CAT (and Conservation and Registration when appropriate) as well as documented via incident reports and photographs.

When necessary for reasons of fragility, high value, complexity of mounting, packing, or transport, etc., the Museum may require items transported outside the Museum to be accompanied by a courier, who will be either a qualified member of the Museum's staff or a delegated representative from another institution.

C. DISASTER PREPAREDNESS AND RESPONSE

The Museum has an established disaster preparedness and response plan ("Emergency Management Plan") that is maintained, updated, and communicated by the Department of Protection Services and FP&O. These procedures address medical and fire emergencies,

evacuation procedures, chemical spills, flooding, leaks and water damage, power outages, bomb threats and suspicious items, and identify means of mitigating risks. In addition to the Museum-wide Emergency Procedures, disaster preparedness and response plans for each collection area shall be included in the respective Collection Area Procedures. These plans will define roles and procedures to ensure continuity of collections stewardship and recovery of collections and documentation in the event of temporary, partial, or full closure of museum facilities.

CATs and other CCR staff shall be familiar with the Emergency Procedures and with the disaster preparedness and response plans specific to their collection area.

Critical documents, such as emergency calling trees, shall be kept current and updated as necessary.

D. INTERVENTIVE CONSERVATION

Interventive conservation treatments are those that alter the physical surface or structure of the object. Interventive treatments include, but are not limited to, destructive or altering testing or analysis, cleaning, reshaping, repairing, restoring, chemical stabilization, consolidation, and coating. All treatments shall be conducted in accordance with the code of ethics and guidance for practice of the American Institute for Conservation.

The underlying principle determining interventive conservation practice is to alter those objects only as absolutely necessary and as little as possible. If choices exist, the least interventive or most reversible strategies are preferred. Materials and methods used will be appropriate to the objectives of each specific treatment and consistent with currently accepted practice. The rationale for decision-making will consider the advantages of the materials and methods chosen, balanced against their potential adverse effects on future examination, scientific investigation, treatment, and function. All proposed and completed examination, analyses, and treatments approved by the CAT will be documented and permanent records will be maintained.

Because interventive conservation is often time-consuming, priorities must be established for selecting areas of the collection to receive conservation attention. These priorities will be based on assessment of those areas of the collection most immediately in need of conservation attention as well as assessment of collections of highest significance. Bases for assessment include rate of active degradation, stability, intended use, and significance of a collection or object. CATs are responsible for assigning priorities, and, when needed, will consult the Center Director(s).

XI. ACCESS AND SECURITY

A. GENERAL PROVISIONS

It is essential to secure, protect, and preserve the collection while at the same time supporting and promoting access for research, communities, publication, exhibition, and educational purposes. Access can be physical (through object examination and handling) or intellectual (through exhibits, publications, and electronic media).

Every effort will be made to provide timely and appropriate access to the collection. The availability of collections will be subject to several factors, including the condition of the materials, security concerns, staff availability, prior obligations, applicable state and federal laws (i.e. intellectual property laws), cultural sensitivity, etc. Physical access will be subject to collection area-specific requirements and procedures. While each collection area sets access guidelines, non-supervised access to non-public collection areas is generally not permitted. Individuals allowed access may have certain requirements or restrictions placed upon them including advance written request and/or fees to cover incurred Museum expenses. Photographs, scans, photocopies, or other reproductions of collections materials may be made only with the prior written permission of the Museum. No collections material or documentation may be removed or altered in any way without appropriate Museum consent. CATs shall be responsible for documenting and reporting all non-staff visits to their collections. The Museum reserves the right to hold users liable for any damage they cause to collections.

Each collection area shall have its own written guidelines regarding access and security for staff and non-staff. These guidelines minimally include provisions laid out in Section XI and shall be reviewed and approved by the Vice President of Collections, Conservation, and Research and the appropriate Center Directors.

B. STAFF ACCESS

1. Collections, Conservation, and Research Staff Access

CCR staff, as defined by their CAT roles or directed/approved by the respective CAT, will have access to the collection(s) assigned to their care or relevant to their research. Volunteer, intern, affiliate, associate, and part-time employee access may be restricted and supervised when deemed appropriate by the CAT. All volunteers must be registered through the Museum's Volunteer Office with approval by at least one CAT member.

2. Service Staff Access

Access by Protection Services staff into collection storage areas, workrooms, and conservation labs will be restricted to scheduled security tours or documented emergencies.

Access by Facilities, Planning & Operations, Information Technology, and Housekeeping staff into collection storage areas, workrooms, and conservation labs will be restricted, and access will be permitted solely by prior agreement. Access will be restricted to business hours and will be supervised by Collections Center staff, except in the case of emergencies or by prior agreement, where Protection Services staff may substitute for Collections Center staff.

C. VISITING SCHOLAR AND COMMUNITY ACCESS

Permission to access the collections for research purposes shall be granted at the discretion of the relevant CAT. Requests will be evaluated according to an assessment of the intrinsic merits of the request, the qualifications of the applicant, and a review of existing and pending Museum priorities and obligations. Visitors, when allowed to handle collection materials, must be informed of appropriate and safe handling methods.

D. TOURS AND GENERAL VISITOR ACCESS

For security and conservation reasons, collection storage locations are not open to the general public. Permission to access the collection for development, education, or other purposes will be granted by the appropriate members of the CAT, Center Director(s), or Vice President. A GFCC or NIRC staff member must accompany all tours through collection storage areas unless special arrangements are made with the relevant CAT to allow trained individuals to lead tours. Public Relations and the appropriate CAT shall be notified in advance of any requests for access by the media.

E. CONTRACTOR SERVICE OR OTHER ACCESS

Contractor access to the collections is barred unless approved by the relevant CAT member(s), Center Director(s), or Vice President and accompanied by authorized GFCC or NIRC staff and Protection Services staff (unless otherwise designated).

Access to the collection for filming or other media purposes will be permitted only with the prior written approval of the responsible CAT and notification to Public Relations. Media staff will be accompanied at all times by a member of the responsible CAT or authorized Collections Center staff, and as appropriate, Protection Services or Public Relations staff. All arrangements related to lighting or the movement of specimens or items must be approved in advance by the CAT.

F. CULTURALLY SENSITIVE COLLECTIONS

Access to certain collections and documents may be further restricted due to cultural sensitivity concerns. Restricted areas, collections, or documentation may therefore require specific permission from the appropriate CAT, as outlined in the relevant CAPs.

G. PHYSICAL SECURITY

CATs shall work with the Department of Protection Services, and other relevant areas, to ensure that all collection storage areas, exhibits, laboratories, and offices are properly secured and risks of theft or vandalism are minimized.

XII. INSURANCE

The Museum recognizes the financial impossibility of insuring the entire collection for its fair market value; it therefore strives to achieve the appropriate balance between the expense of insurance and the obligation to provide protection from loss. With these factors in mind, the Museum strives to insure the collection for the maximum probable loss. Outgoing and incoming loans must always be insured for their fair market value as determined by the lending party. The collection is insured under the Museum's fine arts all risk policy that provides wall-to-wall coverage, subject to the policy exclusions as amended from time to time. The policy covers fine arts, collectible objects of every description, and all associated property – consisting of the property of the Museum, property of others loaned to the Museum that the Museum has agreed to insure, and objects in temporary custody as defined in Section VII.A. Insurance proceeds from the settlement of claims for damage to Museum collections will be used for the conservation and restoration, including staffing, of that specific collection item or items and/or damaged storage space, equipment, and materials.

XIII. USE OF THE COLLECTION

A. GENERAL PROVISIONS

The Field Museum encourages the use of its collection and associated documentation for research, publication, exhibition, and educational purposes. The Museum attempts to accommodate diverse constituencies, including researchers, museum professionals, students, amateurs, artists, and representatives of communities. Requests for access to the collection will

be evaluated in light of the applicant's purpose and credentials, as well as an assessment of the Museum's ability to meet the applicant's needs. The relevant CAT must approve all uses of the collection in their care.

B. ANALYTICAL SAMPLING

To fully realize the research potential of the collection, it may be necessary to remove a sample or permanently alter the appearance or substance of some specimens or items. Because the Museum wishes to balance the preservation of collections with the legitimate needs of the scientific and scholarly community, requests for destructive analysis will be considered in light of certain criteria, including the significance of the research, the intrinsic or monetary value of the object to be analyzed (e.g., unique, sacred, or otherwise sensitive), the researcher's qualifications, the effect on future analyses, and the proposed dissemination of the analysis results.

Each collection area shall establish an approval procedure in its CAPs for analytical sampling that will take into account the need to balance the demands placed on the collections for current research with the obligation for preservation for future use. Advance, written permission for the analytical sampling of collection materials must be sought by all researchers, including Museum staff, outside researchers, and students. Requests for analytical sampling will be reviewed and authorized by the responsible CAT.

Any material that remains shall be returned to the Museum, and any data that arises from the destruction of the specimen shall be provided to the Museum. If the specimen or item will be completely destroyed during sampling or so damaged that its significance for the Museum's collection will be substantially compromised, it shall be deaccessioned in accordance with the provisions of this Policy.

C. COMMERCIAL USE

Any commercial use of the permanent collection is subject to the Museum's Licensing Policy, and may also require the written approval of the relevant CAT and the Vice President.

XIV. INTELLECTUAL PROPERTY RIGHTS

"Intellectual Property Rights" are rights and protections based on federal or state statutes or common law such as patent, trademark, copyright, privacy, and publicity, as well as the moral rights of living artists as delineated in the Visual Artists Rights Act of 1990. Decisions

concerning intellectual property rights shall be made in accordance with the Museum's Information Policy.

A. GENERAL PROVISIONS

The Museum is both a holder and a user of intellectual property. In support of its mission, the Museum strives to protect the intellectual property rights of creators and intellectual property owners, including the Museum itself as rights holder, and promote the responsible dissemination of knowledge by promoting wide access to collections.

Intellectual property rights are distinct from the right to possess a collection itself and arise from its content. The Museum's ability to use collection items or associated intellectual property may be subject to intellectual property rights held by others. The Museum will not knowingly permit infringement of intellectual property rights.

The Museum recognizes that under some circumstances and for some types of collections, the establishment of intellectual property rights may be unclear at the time a collection item is accepted. It also recognizes that ownership of intellectual property rights may change over time for some collection items and under some circumstances. Consequently, the Museum will make a reasonable, good faith effort to identify and document the holder of those intellectual property rights associated with a collection item and to document any restrictions on use.

B. LICENSING AND TRANSFER OF RIGHTS

Fees may be charged to outside organizations and individuals for the use of images and collection items in accordance with the Museum's Licensing Policy or similar policy. If the Museum is to claim intellectual property rights for items permanently transferred to other institutions, including duplicate items, such rights must be expressly retained by the Museum and mutually agreed upon by the recipient organization in writing at the time of the transfer.

When allowing outside parties to create intellectual property from or incorporating the Museum's collection or existing intellectual property, the CAT or other responsible staff member should establish, in writing, each party's rights in and restrictions on use of the resulting intellectual property.

XV. POLICY REVIEW

The Trustees have adopted this Policy following review by Museum staff and Trustee committees. This Policy shall be reviewed at least every five (5) years and the Trustees must approve any amendments.

Original Policy approved by the Trustees September 16, 2013.

Revisions approved by the Trustees March 11, 2019; March 15, 2021; June 11, 2024. Next review and revision before June 2029.

ADDENDUM TO THE FIELD MUSEUM OF NATURAL HISTORY COLLECTIONS MANAGEMENT POLICY—CURATION OF AND ACCESS TO HUMAN REMAINS

I. PURPOSE

The Field Museum continues to work toward a consistent and systematic treatment of all human remains held within its collection. This Policy section provides standards for the curation of and access to all human remains held by the Museum.

II. INTRODUCTION

Human remains must be treated with dignity and respect at all times. They should be curated responsibly and carefully, available for appropriate scientific study, and accessible for legitimate cultural, scientific, or educational purposes. The Museum acknowledges that many of the remains in its care are ancestral to modern-day communities and recognizes its role in the collection, acquisition, and possession of human remains that may have been obtained in violation of spiritual and cultural beliefs and without the free, prior, and informed consent of the individuals or communities from whom they were taken. This Policy recognizes the complexity of the required care and curation of human remains held within educational and research institutions, and it establishes Museum policies for the continued care of these sensitive collections. Such complexity stems from many different—sometimes opposing—socio-cultural, spiritual, political, scientific, and academic perspectives and values surrounding human remains. This Policy seeks to ensure the appropriate protection and continued care of human remains in the Museum’s collection, weighing ethical issues and communities’ concerns with the Museum’s fiduciary obligations to preserve its collection and its potential for scientific advancement through investigation and study. Of particular concern are investigative studies that involve invasive sampling and associated analyses. This Policy defines the Museum’s responsibilities for the respectful care and management of human remains and outlines processes for managing access for cultural and scientific research visits to these collections.

The Museum is committed to providing the utmost respect to all groups or persons whose ancestral remains are in the Museum’s possession. The Museum strives to treat all parties (of lineal descent or otherwise) who have a legitimate and valid interest in human remains with dignity and respect. Related to this, the Museum has a responsibility to conform to federal and state laws, including, but not limited to, the Native American Graves Protection and Repatriation Act (NAGPRA).

The Museum houses the remains of individuals from all over the world. The Museum desires to follow protocols and policies throughout its human remains collections to meet museum standards for care and, where possible, that are appropriate to the regional, cultural, or temporal origins of the individuals for whose remains we care. While recognizing the great value and potential of human remains for contributing to scientific knowledge, this Policy also takes into consideration the various cultural and religious concerns of relatives and indigenous and descendant communities.

III. HUMAN REMAINS DEFINED

For purposes of this Policy, “Human Remains” is used to mean the bodies or parts of bodies of once living people from anatomically modern humans. This includes osteological material (whole or partial skeletons, individual bones, or fragments of bone and teeth); soft tissue including organs, skin, hair and nails; embryos; and slide preparations of human tissue. Human remains also include any of the above that may have been culturally modified or that may be bound up with or connected to other non-human materials to form a composite item, except that, under NAGPRA, Native American human remains that have been incorporated into a funerary object, sacred object, or object of cultural patrimony are considered part of that cultural item rather than human remains. “Human Remains” does not include remains or portions of remains that may reasonably be determined to have been freely given or naturally shed by the individual from whose body they originated or were obtained, such as hair made into ropes or nets, or in the case of Native American human remains, that have been obtained with full knowledge and consent of the individual, their next of kin, or the appropriate Tribe or Native Hawaiian organization (“NHO”).

IV. CARE AND CURATION OF HUMAN REMAINS

All human remains at the Museum shall be housed within a single climate- and access-controlled facility, the Human Remains Facility, except those human remains incorporated into items, those requiring certain specialized storage (such as fluid-preserved remains or frozen tissue), those in a Field Museum exhibition, or those on loan for study or exhibition at another institution.

The human remains in the Museum’s collection represent a variety of states of preservation and presentation (i.e., entire skeletons, individual components, incorporation into items). This variation necessitates adaptable care and curation guidelines, so that each situation can be addressed to the best of the Museum’s abilities. Specific guidelines for the continued care and curation of the human remains housed in the Museum’s collection shall be as stated in the Policy Guidelines for the Curation of and Access to Human Remains (“Guidelines”) as approved by the

Vice President, but care of each individual set of remains will vary as necessary on a case-by-case basis.

V. CONSERVATION OF HUMAN REMAINS

Any interventive conservation work should be undertaken only by qualified conservators in accordance with strict protocols, and only when necessary. The principle of minimum intervention and reversibility should always be applied, avoiding treatments that will contaminate or damage human remains. In the case of Native American human remains, informed consent must be obtained from the affiliated Tribe(s) or NHO(s) prior to undertaking any conservation treatment.

VI. ACCESS TO THE HUMAN REMAINS FACILITY AND COLLECTIONS

Human remains hold the potential for great scientific value while also possessing significant cultural importance. The Museum is committed to seeking out and following community guidance through Consultation whenever possible regarding access to ancestral human remains for teaching, research, and other access requests. In the case of Native American human remains, informed consent must be obtained from the affiliated Tribe(s) or NHO(s) prior to allowing access. Access requests will also be carefully and thoroughly reviewed by the relevant Collection Administrative Team (“CAT”). Human remains collections are unique, fragile, and irreplaceable and shall not be used for entertainment purposes. In keeping with the Museum’s fiduciary obligation to preserve its collection, Museum staff shall resist short-term trends or opportunistic uses of human remains to ensure their long-term preservation and scientific potential.

A. VISITOR ACCESS

Due to the highly sensitive nature of the human remains in its collection, the Museum strictly limits access to storage spaces housing human remains. A select and minimal number of staff members are allowed independent access to these spaces. Staff having independent access shall be designated in writing by the Vice President of CCR and shall include the members of the appropriate CATs, the Directors of GFCC and NIRC, and the Co-directors for the Center for Repatriation, and other staff deemed appropriate by the Vice President. All non-designated-staff visitors to the Human Remains Facility shall require prior written approval from the appropriate CAT. In the case of Native American human remains, informed consent must be obtained from the affiliated Tribe(s) or Native Hawaiian organization(s) prior to allowing visitation of the human remains affiliated with that Tribe or NHO. Unofficial visits (e.g., tours) to the Human Remains Facility are prohibited. Digital access to human-remains-related media and

documentation shall be limited via extra security clearance protocols as specified in the Guidelines.

B. RESEARCH ACCESS

Prior to any research access to the human remains under the Museum's care, all researchers (both internal and external to the Museum) shall agree in writing to follow Museum policies and procedures regarding access to and handling and documentation of human remains as described in this Policy and the Guidelines. Non-invasive analyses are the preferred research method whenever possible. Proposals for non-invasive research projects involving only visual assessments of human remains require prior written approval by the appropriate CAT. Proposals that require any handling and manipulation of human remains require prior written approval from the appropriate CAT and notification will be provided to the GFCC and NIRC Directors and the Co-directors for the Center for Repatriation. All research projects (both internal and external) requesting invasive sampling require prior written approval by the appropriate CAT and the Vice President or their delegate and these must follow the protocols specified in this Policy and the Guidelines. External research requests for invasive sampling will be administered and treated as institutional loan requests. In the case of Native American human remains, the researcher must provide written proof that they have obtained informed consent from the affiliated Tribe(s) or NHO(s) for their research project. In other cases, whenever possible, the relevant CAT will request review and feedback of research proposals by appropriate lineal descendants, descendant community representatives, or culturally affiliated groups.

VII. ANALYSIS OF HUMAN REMAINS

Analysis of human remains should be undertaken pursuant to the highest standards by appropriately qualified researchers. In the case of Native American human remains, the researcher must obtain prior, informed consent from the affiliated Tribe(s) or NHO(s) for the analysis. Prior to the commencement of any investigative analysis, all human remains to be studied must be properly documented. Any results of the analysis (including genetic analysis) that will be used for commercial purposes or for purposes outside the scope of the approved research proposal also will require prior authorization by the appropriate CAT and the Vice President (or their designee), and will be memorialized in a written agreement prepared in consultation with the Museum's Office of the General Counsel. In the case of Native American human remains, the affiliated Tribe(s) or NHO(s) must authorize any changes to the scope or application of the analysis not originally disclosed.

A. INVASIVE ANALYSIS

Invasive or destructive analysis of human remains is defined as any form of analysis that leads to the partial or complete destruction of any aspect of the human remains being studied. Common analyses in this category include but are not limited to DNA extraction and sequencing, destructive isotopic or elemental assessments, and radiometric dating. In such cases, the smallest possible quantity of material necessary for the scientific purpose should be extracted.

As provided in the Guidelines, researchers requesting access to the human remains collections for invasive or destructive analyses must provide extensive justification for the study. Factors to be considered shall include the overall rarity of the requested collection or individual, the potential cultural significance of the remains, and the scientific potential of the proposed research. In the case of Native American human remains, the researcher must show that they have the informed consent of the affiliated Tribe(s) or NHO(s) to undertake invasive or destructive analysis.

VIII. EXHIBITION OF HUMAN REMAINS

The Museum collection exists both for research and for public education through exhibitions. Careful thought should be put into the reasons for and circumstances of the display of human remains. Human remains should be displayed only when it is culturally appropriate as decided by the relevant CAT (following Consultation with lineal descendants, descendant communities, and culturally affiliated groups when possible) and provides a material contribution to the educational mission of the Museum. The public shall be notified that human remains are included in the exhibition, and such displays shall always be accompanied by information explaining the importance and relevance of the display.

In the case of Native American human remains, informed consent must be obtained from the affiliated Tribe(s) or Native Hawaiian organization(s) prior to the exhibition of human remains affiliated with that Tribe or NHO. In all other cases, the Museum will not permit display of human remains when a lineal descendant, descendant community, or culturally affiliated group expresses a specific objection to the public exhibition of the human remains. In the case of human remains from countries outside of the United States, the Museum will look to the exhibition practices of those countries and to cultural traditions of the relevant communities within those countries.

**APPENDIX A: FIELD MUSEUM OF NATURAL HISTORY COLLECTIONS
MANAGEMENT POLICY—CRITERIA FOR ACQUISITIONS, ACCESSIONS AND
DEACCESSIONS**

I. DETERMINATION OF VALUES

Where necessary for internal Museum purposes, the determination of scientific, educational, exhibition, and estimated-fair-market values shall be the responsibility of the CAT in charge of a particular collection. Estimates will rely on staff knowledge, market comparables, and possible referrals to external expertise.

A determination of fair market value will be appropriate for specimens or items that are generally available on the open market (e.g., works of art, gems, books), but it will not be appropriate for most biological specimens (botanical or zoological) and many geological specimens.

II. ACQUISITIONS AND ACCESSIONS

A. COMPLIANCE WITH POLICY

All acquisitions and accessions to the collection shall be made in accordance with the Policy (*see* Policy Section IV) and the applicable Collection Area Procedures.

B. APPROVALS

Routine acquisitions and accessions shall be approved by the responsible CAT. Any disagreement that cannot be resolved shall be forwarded to the Directors of the GFCC and NIRC for consideration and a decision. A decision by the Directors may be appealed to the Vice President and then to the President.

Acquisitions and accessions shall also be reviewed and approved by the Directors of the GFCC and NIRC, in consultation with the Vice President, whenever the potential acquisition or accession:

- has significant publicity value or is considered high-profile;
- has significant or monetary value as established in this Appendix;
- represents a major new area of collecting for the Museum;
- includes any material legal restrictions (e.g., intellectual property rights); or

- requires substantial or special resources (e.g., shipping, preparation, conservation, housing requirements, or storage space) beyond that allocated in the Museum's current annual budget.

If in doubt, the Center Director(s) and Office of General Counsel should be contacted for guidance. In the case of significant acquisitions or accessions, the Center Director(s) shall consider and evaluate whether the approval of the Vice President, President, and/or Collections Committee and/or Repatriation Subcommittee also should be sought.

When a determination of fair market value is possible and the aggregate fair market value is estimated to be more than \$100,000, an expert third-party opinion or independent, professional appraisal may be required by the Vice President before approving the purchase or exchange of a specimen, item, or collection.

For collection objects where fair market value is appropriate and may be determined by the responsible CAT, the acquisition of collection objects with an aggregate estimated fair market value of less than \$75,000 shall be approved by the appropriate CAT.

If the total estimated fair market value is more than \$75,000 and less than \$999,000, then the approval of the Center Directors and Vice President also shall be required.

If the total estimated fair market value is more than \$1,000,000, then the approval of the President shall also be required.

The Center Director(s), Vice President, President, and/or Office of the General Counsel may also determine that the approval of the Collections Committee, Repatriation Subcommittee, and/or Board of Trustees is also required.

III. DEACCESSIONS AND DISPOSALS

A. APPROVALS

1. Compliance with Policy

All deaccessions from the permanent collection shall be made in accordance with the requirements specified in the Policy (*see* Policy Section V) and the applicable Collection Area Procedures.

2. Approvals

Routine deaccessions and disposal methods from a collection of materials with an estimated value of less than \$250 shall be approved by the responsible CAT. Any disagreement that cannot be resolved shall be forwarded to the Center Director(s) for consideration and a decision. A decision of the Director(s) may be appealed to the Vice President and then to the President.

Deaccessions and disposal methods shall also be reviewed and approved by the GFCC and NIRC Director(s) in consultation with the Vice President whenever the object or collection:

- has significant publicity value or is high-profile;
- represents the entire collection;
- is recommended for sale;
- includes any material legal restrictions; or
- is within five (5) years of receipt of a gift.

If in doubt, the Center Director(s) and Office of General Counsel should be contacted for guidance. In the case of a significant deaccession, the Center Director(s) shall consider and evaluate whether the approval of the Vice President, President, or Trustees' Collections Committee and/or Repatriation Subcommittee also should be sought.

For collection objects where fair market value is appropriate and may be determined, the responsible CAT may approve the deaccession and disposal method for collection objects with an aggregate estimated fair market value of less than \$25,000.

If the total estimated fair market value is more than \$25,000 and less than \$150,000, then the approval of the Center Directors and Vice President also shall be required. If the total estimated fair market value is more than \$150,000, then the approval of the President also shall be required.

If the total estimated fair market value is more than \$250,000, then the approval of the Trustees' Collections Committee and/or Repatriation Subcommittee also shall be required. If the total estimated fair market value is more than \$1,000,000, then the approval of the Board of Trustees also shall be required.

APPENDIX B: HISTORY OF THE COLLECTIONS MANAGEMENT POLICY

In the early 1970s, the Field Museum of Natural History's Board of Trustees and staff recognized that it was time for standing procedures related to the collection, specifically accessions, deaccessions, and loans, to be systematized into formal policy. In 1972, the Trustees adopted a policy statement on the acquisition of antiquities. Several years later, a more inclusive policy statement on accessions and deaccessions was prepared by a committee of Trustees and staff, and adopted by the Trustees on November 17, 1975. A loans policy statement was prepared in similar fashion and adopted by the Trustees on December 20, 1976. In 1996, both documents were revised and brought into line with the Field Museum's Code of Ethics (first adopted by the Trustees on April 15, 1996). The revised Policy Statement on Accessions and Deaccessions and the revised Policy Statement on Loans from the Reference Collections were adopted by the Trustees on August 19, 1996. In 1999, the Trustees' Collections and Research Committee launched a review of the section of the deaccessions policy dealing with proceeds from sales of collection materials. The Trustees approved an amendment to that section on September 9, 2002. Also during the 2000s, each scientific department developed specific guidelines, referred to as "Collections Area Procedures," for their collections that were consonant with the Trustees' policy statements on accessions, deaccessions, and loans.

On October 16, 1989, the Trustees adopted a Policy Statement Concerning Requests for Reinterment of Human Remains and Burial Objects. This policy statement was designed to create a limited exception to the institution's general policy on deaccessions. Following Congress's 1990 enactment of the Native American Graves Protection and Repatriation Act (NAGPRA), the Trustees adopted an addendum to this policy statement that further articulated the Museum's procedures relating to repatriation requests submitted by Native Americans. On December 19, 2011, the Trustees approved updated Repatriation Policies and Procedures that reflected the evolution of museum standards and practices.

On April 1, 2013, the Museum's four historical departments of Anthropology, Botany, Geology, and Zoology, along with the Museum's Library and the Environment, Culture and Conservation program (ECCo) were reorganized into an integrated structure called "Science and Education." Science and Education included four interdisciplinary Centers: Collections, Integrative Research, Action, and Learning.

The Museum's existing Trustee-approved policies on antiquities, accessions, deaccessions, repatriations, and loans were merged into one comprehensive collections management policy and revised to reflect the Museum's new administrative structure. The unified Collections Management Policy was approved by the Trustees on September 16, 2013, (the "Policy") and is to be interpreted in accordance with the Museum's purpose, mission, and Code of Ethics.

An addendum on the curation and care of human remains was added to the policy in 2018.

Revisions to the Policy were approved by the Trustees March 11, 2019; March 15, 2021; and June 11, 2024.

In 2023, the Learning Center was repositioned within the Museum's Public Experience division. "Science and Education" was renamed "Collections, Conservation, and Research (CCR)," and includes the scientific centers of Collections, Integrative Research, and Action. The Center for Repatriation was established in CCR in February 2024.