



Staff Policy D-504.05

Institutional Effectiveness Criterion: Operations

Denno Museum Center Collections Management

Table of Contents

1. Denno Museum Center Collection Statement
 - I. Mission Statement
 - II. Governance
 - III. Scope of Collections
 - IV. Collections Statement
 - V. Collection Categories
2. Collections Committee
3. Acquisitions
 - I. Acquisition
 - II. Antiquities and Ancient Art
 - III. Nazi-era Provenance
4. Accessions
5. Deaccessions
6. Catalog
7. Inventory
8. Cataloging
9. Inventory
10. Loans
 - I. Outgoing
 - II. Incoming
 - III. Campus Loans
11. Collections Care
 - I. Preventive Conservation
 - II. Safe Handling
 - III. Conservation
12. Recordkeeping
13. Integrated Pest Management
14. Collections Access
15. Collections Security
16. Emergency Preparedness
17. Personal Collecting
18. Research
19. Exhibitions
20. Reproduction and Copyright
21. Rules for Handling Works of Art

DENNOS MUSEUM CENTER COLLECTION STATEMENT

I. Mission Statement

The Dennos Museum Center (DMC) builds community, sparks conversation, and inspires change for audiences of all ages through its exhibitions, programs, and the collection and preservation of art. – Approved by the NMC Board of Trustees July 26, 2021.

II. Governance

As a unit of Northwestern Michigan College (NMC), the DMC has as its official governing authority the Northwestern Michigan College Board of Trustees. The Executive Director reports to the Vice President of Finance who serves on behalf of the Northwestern Michigan College Board of Trustees and the President of Northwestern Michigan College to oversee the affairs of the DMC. In turn, the Executive Director works closely with DMC staff and seeks counsel from members of advisory bodies to develop and refine the mission, vision, and goals and to ensure their implementation.

All those who work for or on behalf of the DMC understand and support its mission and public trust responsibilities. The DMC and its physical, human, and financial resources are developed, maintained, protected, and interpreted in support of this mission. The development and preservation of the collection and its use to support the educational goals of teaching and research are fundamental responsibilities of the DMC.

The DMC has written policies that govern its operations. These policies, approved by the Board of Trustees, support the mission, vision, and goals of the DMC as defined in its long• range plan. Members of the governing authority, staff, advisory bodies, and volunteers of the DMC must be united in their commitment to the institution's purposes and responsibilities as reflected therein.

III. Scope of Collections

The Dennos Museum Center houses a collection of nearly 3,000 works of art. Approximately 1,600 objects are prints, sculptures, and other artworks made by the Inuit people of the Canadian Arctic, Greenland, and Alaska. The remainder of the collection includes a diverse array of painting, sculpture, prints, and photography. Significant holdings include contemporary works by Michigan artists, 19th and 20th century American and European graphic art, 18th and 19th century Japanese prints, and 20th century Great Lakes Indian and Canadian Indian art.

IV. Collections Statement

The purpose of the DMC's collection is to provide a rich and diverse resource of works of art and objects of cultural significance, both contemporary and historical, which foster discussions, exhibitions, teaching, and research across disciplines. Special attention is given to works of artistic and/or historical significance, cultural diversity, and relevance to the critical issues of our time. The DMC collects works that enrich and enhance the educational mission of NMC and are utilized for exhibition, teaching, or research.

V. Collection Categories

This document is intended to outline the four types of collections that are managed and maintained by the DMC staff at Northwestern Michigan College:

Permanent Collection

Fully accessioned, documented, and cataloged objects of artistic, cultural or historical significance, and objects of high quality that are representative of the diversity inherent in the mission of the DMC. These collections are used for research, exhibitions, and loans and are given the highest level of care and protection. The services of a professional conservator would be required to treat works in this category.

- Original prints, drawings, paintings, sculpture, photographs, and other works of historical/art historical significance

Outdoor Sculpture Collection

Fully accessioned, documented, and cataloged outdoor sculptures of artistic, cultural or historical significance, these collections are installed outdoors year-round and require ongoing maintenance and upkeep to preserve the integrity and intent of the work. Maintenance and upkeep plans are defined in the DMC's Long Range Conservation Plan and/or Strategic Plan.

- Outdoor sculptures located on DMC grounds and throughout NMC's campuses

Decor Collection

Accessioned objects that may be partially or fully cataloged and used for display/decor on campus. Conservation/restoration is on a case-by-case basis. Works will have numbers assigned for tracking purposes, but may not necessarily be fully cataloged into the database.

- Furniture or other articles historically owned/exhibited by the college (the DMC maintains records, but is not responsible for up-to-date inventory)
- Works purchased specifically for display on campus or as decor

Non-accessioned Education Collection

Teaching objects that are used for interpretation, participatory exhibitions, educational programs, and hands-on learning. These objects do not receive a catalog number and are not accessioned into the collection-as a result, they can be removed if damaged or deemed no longer relevant for teaching use. These objects are given all reasonable care but may be treated/repared by DMC staff if deemed appropriate.

- Ex: Reproductions, tourist art, sculptures, textiles, etc. with little or no provenance
- Hands-on materials from the Inuit teaching collection

COLLECTIONS COMMITTEE

Purpose of the committee:

- Approve works for inclusion in the Dennon Museum Center permanent art collection
- Approve deaccessions from the collection

Rationale for committee formation:

- Common practice at all collecting institutions
- Removes curatorial bias from the decision-making process
- Creates a mechanism for avoiding gifts that may produce undesirable consequences in the long term (ex: restricted gifts, works in poor condition, oversize works with no appropriate storage, etc.)

Committee approval process:

1. Registrar completes accession/deaccession proposal form
2. Registrar circulates paperwork among committee members via e-mail, along with the director's recommendation
3. Majority of members approve or deny request via e-mail

Curatorial limitations:

The Executive Director may purchase artwork/objects for the permanent art collection without committee approval if the total purchase price is under \$5,000. Purchases for the collection in excess of \$5,000 must be approved by the collections committee in advance.

Committee appointments:

7 members, voting

2-3 year staggered appointments made by DMC Executive Director

- Museum Director (co-chair)
- Museum Registrar (co-chair)
- Art Faculty
- NMC Staff or Faculty
- NMC Library/Archives Staff
- External Museum/Gallery Partner
- External Museum/Gallery Partner

*The committee shall convene at least once every calendar year in-person to discuss the state of the Dennon Museum Center collection.

**Anticipated workload for all committee members is 5-8 hours per academic year, plus 1-2 hours during the summer months (via e-mail).

ACQUISITIONS

I. Acquisition

Acquisition is the process of acquiring an object(s) or collection for the collections of the DMC. Object(s) or collections are typically acquired through donation, purchase, transfer from or exchange with another institution, or bequest. Acquisition, except as approved in writing by the Executive Director, does not imply accessioning, but is a necessary prerequisite for accessioning. Acquired objects or collections are recommended for accessioning by the Executive Director.

Certain state, federal, and international statutes and laws are in existence that may affect the acquisition of certain objects. In all cases, the DMC acts in accordance with those statutes and laws. Additionally, the DMC bases its acquisition and accession policy statements and procedures on the highest ethical standards as set out in its own Code of Ethics. This Code is based on national and international Codes of Ethics for museums and ensures that the DMC operates in all respects to the highest professional standards.

The following policy statements support an attitude of responsible collections management. They provide guidance for acquisition for authorized DMC personnel. Adherence to these statements promotes responsible collecting and ensures the appropriate housing, preservation, and conservation accountability inherent in the acceptance of objects or collections. Reference to these restrictions fosters a spirit of understanding and cooperation with prospective donors by serving as a defined justification for acceptance or rejection of donations, purchases, transfers, or bequests.

The following policy statements are also guided by:

- The UNESCO Convention on the Means of Prohibiting and Preserving the Illicit Import, Export and Transfer of Ownership of Cultural Property of 1970 (accepted by the US in 1983)
 - The Association of Art Museum Directors (AAMD), "Report of the AAMD Task Force on the Spoliation of Art during the Nazi/World War II Era (1933-1945)," 1998
 - The American Alliance of Museums (AAM), "Code of Ethics for Museums," 2000
 - The American Alliance of Museums (AAM), "Guidelines Concerning the Unlawful Appropriation of Objects During the Nazi Era," 2001
 - The Association of Art Museum Directors (AAMD), "Report of the AAMD Task Force on the Acquisition of Archaeological Materials and Ancient Art," 2004
1. At the most fundamental level, the DMC categorically endorses the concept that responsibility for the physical safety of the object begins with acquisition.
 2. All potential acquisitions must be evaluated in terms of the goals, purpose, mission, and scope of the DMC, and the educational aims of the museum, and must fall within financial and physical limitations of the institution.
 3. All potential acquisitions must be evaluated by the following criteria:
 - a. Documentation as to origin, previous ownership, use, and provenance.
 - b. Ability of the DMC to properly maintain and house the objects and associated documentation.
 - c. Relevance of acquisition to the mission statement and scope of collections of the DMC, and its ability to enhance collections.
 - d. Legal and ethical standards governing possession and use of objects. The DMC will

- not knowingly accept any object or collection acquired by either illegal or unethical means.
- e. Willingness of the donor (owner) to transfer complete ownership (provide clear title) to the DMC without restrictions, limitations, or conditions. Transfer of legal title is through a signed deed of gift between the DMC and owner that identifies the owner, the DMC, and all objects for which ownership is transferred.
 - f. Intellectual Property (IP) consideration.
4. The DMC will acquire no object(s) or collection, by any means, for which a valid title cannot be obtained. It is critical that clear title is established, to the best knowledge of all parties, prior to acquisition.
 5. Collections care begins with acquisition. It is the responsibility of the DMC Registrar and the Executive Director as appropriate to ensure that preventive conservation and collections management best practices are followed.
 6. Restrictive or conditional donations will be considered only under extraordinary circumstances and when the long-term advantage to the DMC is unequivocal. Any consideration of such donations must be accompanied by a legal document that conveys any restrictions or conditions. Fine arts object(s) executed after January 1, 1978 that are subject to the Copyright Act of 1976 (17 U.S.C. §§ 101-702) are considered for acquisition only after a thorough review of copyright restrictions.
 7. For the purpose of acquisition, the Executive Director is relied upon for a judgment of value and provenance, and their determination is final.
 8. The DMC or its staff cannot ethically or legally appraise objects for private citizens prior to donation or at any time thereafter, retain an appraiser for a private citizen, or refer an appraiser to a private citizen, and, therefore, shall not be involved in appraisal activities. This restriction does not apply to in-house assessments of value of objects owned by the DMC for such collection objectives as insurance purposes, traveling exhibitions, loans, or for activities within the professional community that involve establishing the relative monetary value of certain kinds of objects. These activities are viewed as professional assessments and not commercial appraisals. Donors requiring appraisals for income tax purposes must obtain these at their own expense from a certified appraiser of their choice prior to donation.
 9. Collections of objects acquired through purchase are the property of the DMC, are accessioned, and all bills of sale and appropriate records are kept by the DMC.
 10. Acquisitions of the DMC are the property of the DMC. The DMC is not legally bound to acquire or consider for accession objects that are acquired by NMC on behalf of the DMC without prior agreement.
 11. The DMC does not acquire object(s) or collections of questionable origin (legal or ethical), nor does the DMC exhibit or otherwise allow the utilization of such object(s) or collections.
 12. The acquisition of cultural property of foreign countries is to be guided by the policies

of the 1970 UNESCO Convention, the "Guidelines Concerning the Unlawful Appropriation of Objects During the Nazi Era, 2001," and the "Report of the AAMD Task Force on the Acquisition of Archaeological Materials and Ancient Art," 2004.

13. Certain works of art deemed inappropriate for accession into the permanent collection may be accepted as gifts for study purposes, as incidental decoration for public or office spaces, or as non-accessioned unrestricted gifts that may be sold. These works are not formally accessioned, but the Registrar tracks their status as non-accessioned acquisitions.
14. The DMC does not acquire personal memorabilia, nor does the DMC accept like material from NMC, unless the material has general relevance to the mission and scope of the DMC.
15. Objects bequeathed to the DMC must be approved for acquisition prior to the DMC being designated as beneficiary. All objects bequeathed to the DMC are subject to the Acquisition and Accession policy defined in this document. The DMC shall observe appropriate confidentiality with respect to objects acquired through bequest. The DMC is not legally bound to acquire objects that are bequeathed to it, unless by prior agreement.
16. Donors of acquisitions must be made to understand that only the Executive Director of the DMC is authorized to make agreements for the temporary or permanent exhibit of object(s). To this end, it is assumed that all acquisitions, regardless of right of ownership, will be reviewed by the Executive Director of the DMC to determine appropriateness to collection needs and possible utilization potential prior to any commitment or agreement by NMC. Acquisitions are reviewed in accordance with the loan qualifications and conditions as outlined in the Loans section of this Policy and as defined in the Loan Procedures segment of the Collections Management Procedures document. Donors also must understand that while the fiduciary responsibility for the donated object(s) rests with NMC, the management of such object(s) is under the control of the Executive Director of the DMC.
17. The Executive Director and the Registrar appointed by NMC shall serve as members of the Collections Committee. The Executive Director has final authority regarding acquisitions.
18. All items acquired for the permanent collections of the DMC will be accessioned in a timely manner.
19. The DMC maintains a computerized record-keeping system of all objects acquired or received by any approved means into its care.
20. Recordkeeping begins with acquisition and is the responsibility of the DMC Registrar and Executive Director as appropriate. Records include: acquisitions, accessions, catalogs, inventory, loan, insurance, condition report, treatment forms, field forms, photographs (film, digital images, video recordings), and business records. Records are comprised of both paper documents and digital files. All computerized records are updated and a digital copy stored at an off-site location by the Registrar. Paper records are housed in appropriate cabinetry, file, or refrigerated unit (as required).
21. Donor information and credit is maintained as part of the acquisition file, the accession file, and on the catalog record. It is not used as part of labeling while the object(s) is on exhibit without the prior signed consent of the donor.

22. Because the DMC is a non-profit educational entity of NMC, a potential donor must be informed of the restrictions under which gifts may be given. Acquisitions by the DMC, once accessioned, are subject to the Deaccessioning section of the Collections Management Policy, and except as specifically stated, no object(s) is sold, traded, returned to donor, or otherwise removed from the care and protection of the DMC.
23. Certain state, national, and international statutes and laws currently in existence may require that acquired and accessioned objects are deaccessioned from the collections of the DMC and repatriated, as per the specific statute or law. The DMC abides by such statutes and laws currently in existence and those that may be brought to apply in the future. Prospective donors of material likely to be affected by such legislation are informed of this likelihood during initial donation discussions.
24. Per AAM best practices, object(s) deaccessioned from the DMC permanent art collection will not be returned to the donor or heirs.

II. Antiquities and Ancient Art

The DMC is committed to the ethical and responsible acquisition of works of art. The DMC's goal is to preserve, display, and interpret our shared cultural heritage in the interests of the public.

1. The item to be acquired must have free and clear title. The DMC will require sellers, donors, and their representatives to provide all available information and documentation, as well as appropriate warranties regarding the origins and provenance of a work of art offered for acquisition.
2. The acquisition of cultural property of foreign countries is to be guided by the policies of the 1970 UNESCO Convention and the Report of the AAMD Task Force on the Acquisition of Archaeological Materials and Ancient Art, 2004. The DMC will not accept or purchase an item known to have been "stolen from a museum, or a religious, or secular public monument or similar institution" (Article 7b of the Convention) or known to have been part of an official archaeological excavation and removed in contravention of the laws of the country of origin.
3. The DMC will comply with all applicable local, state, and federal laws, most notably those governing ownership, title, import, and other issues critical to acquisitions. The law relevant to the acquisition of archaeological materials and ancient art has become increasingly complex and continues to evolve. Since the status of a work of art under foreign law may bear on its legal status under U.S. law, it is important to be familiar with relevant U.S. and foreign laws before making an acquisition.
4. The DMC will only acquire objects that have been rigorously researched. Such research will include, but will not necessarily be limited to, determining:
 - a. The ownership history of the object;
 - b. The countries in which the object has been located and when;
 - c. The exhibition history of the object, if any;
 - d. The publication history of the object, if any;
 - e. Whether any claims of ownership of the object have been made;
 - f. Whether the object appears in relevant databases of stolen works; and
 - g. The circumstances under which the object is being offered to the DMC; and documentation that shows that the object was exported from its country of origin before 1970.
5. The DMC will make a concerted effort to obtain accurate written documentation with respect to the history of the object, including import and export documents from all parties involved in the transaction. The DMC should always obtain the requisite import documentation when the object is being imported into the United States in connection with its acquisition by the DMC.
6. Should any of the research cited above demonstrate that the object is known to have been "stolen from a museum, or a religious, or secular public monument or similar institution" (Article 7b of the Convention), or from an individual or family collection, or "known to have been part of an official archaeological excavation" or other repositories either within or without the United States "and removed in contravention of the laws of the country of origin," the DMC will not acquire the object.

7. However, even after rigorous research, it may not be possible to obtain sufficient information on the recent history of a proposed acquisition or to determine securely whether the acquisition would comply with applicable law and the aforementioned Ethics and Guidelines. In such cases, the DMC must use its professional judgment in determining whether to proceed with an acquisition, in accordance with the Principles outlined above, recognizing that the work of art or object, the culture it represents, scholarship, and the public may be served best through the acquisition of the work of art by the DMC, which is dedicated to the conservation, exhibition, study, and interpretation of works of art. Such antiquities should be recommended for acquisition for the following reasons:
 - a. The object is in danger of destruction or deterioration.
 - b. The acquisition would make the object publicly accessible, providing a singular and material contribution to knowledge, as well as facilitating the reconstruction of its provenance, thereby allowing possible claimants to come forward.
 - c. The object has been outside its probable country or countries of origin for a sufficiently long time (at least 10 years) and its acquisition would not provide a direct, material incentive to looting or illegal excavation.
8. Sellers, donors, and their representatives must provide all available information and documentation, as well as appropriate warranties regarding the origins and provenance of an object offered for acquisition.
9. Once an acquisition has been accessioned, the DMC shall publish promptly, in print or electronic form, an image (or representative images in the case of large groups of objects) and relevant provenance information, which will thus be readily available to an international audience.
10. If the DMC gains information that establishes another party's claim to an object acquired, even though this claim may not be enforceable under U.S. law, the DMC shall seek an equitable resolution with the other party. Possible options that shall be considered include: transfer or sale of the object to the claimant; payment to the claimant; loan or exchange of the object; or retention of the object.
11. Competing claims of ownership that may be asserted in connection with objects in the DMC's custody shall be handled openly, seriously, responsively, and with respect for the dignity of all parties involved. Where unethical collecting practices are alleged, verification of the facts is necessary before a judgment or condemnation is appropriate.

III. Nazi-era Provenance (1937 - late 1940s)

The ethics and guidelines outlined above are equally applicable to objects with Nazi-era provenance. However, the principles guiding the acquisition of objects falling into this category are here treated separately in order to ensure that the DMC shall take all reasonable steps to resolve the Nazi-era provenance status of objects before acquiring them into its collection whether by gift, bequest, purchase, or exchange.

1. Standard research on objects being considered should include a request that the sellers, donors, or estate executors offering an object provide as much provenance information as they have available, with particular regard to the Nazi era.
2. Where the Nazi-era provenance of a proposed acquisition is incomplete or uncertain, the DMC shall consider what additional research would be prudent or necessary to resolve the Nazi-era provenance status of the object before acquiring it. Such research shall involve consulting appropriate sources of information, including available records and outside databases that track information concerning unlawfully appropriated objects.
3. In the absence of evidence of unlawful appropriation without subsequent restitution, the DMC may proceed with the acquisition. Currently available object and provenance information about any covered object shall be made public as soon as practicable after the acquisition.
4. If credible evidence of unlawful appropriation without subsequent restitution is discovered, the DMC shall notify the donor, estate executor, or seller of the nature of the evidence and shall not proceed with acquisition of the object until taking further action to resolve these issues. Depending on the circumstances of the particular case, prudent or necessary actions may include consulting with qualified legal counsel and notifying other interested parties of the DMC's findings.
5. It is acknowledged by the AAM that under certain circumstances acquisition of objects with uncertain provenance may reveal further information about the object and may facilitate the possible resolution of its status. In such circumstances, the DMC may choose to proceed with the acquisition after determining that it would be lawful, appropriate, and prudent and provided that currently available object and provenance information is made public as soon as practicable after the acquisition.
6. The DMC shall document its research into the Nazi-era provenance of acquisitions.
7. Consistent with current practices in the museum field, the DMC shall publish, display, or otherwise make accessible recent gifts, bequests, and purchases, thereby making all acquisitions available for further research, examination, and public review and accountability.
8. The DMC shall address claims of ownership asserted in connection with objects in its custody openly, seriously, responsively, and with respect for the dignities of all parties involved. Each claim shall be considered on its own merits.

9. The DMC shall review promptly and thoroughly a claim that an object in its collection was unlawfully appropriated during the Nazi era without subsequent restitution.
10. In addition to conducting its own research, the DMC should request evidence of ownership from the claimant in order to assist in determining the provenance of the objects.
11. If the DMC determines that an object in its collection was unlawfully appropriated during the Nazi era without subsequent restitution, the DMC shall seek to resolve the matter with the claimant in an equitable, appropriate, and mutually agreeable manner.
12. When appropriate and reasonably practical, the DMC shall seek methods other than litigation (such as mediation) to resolve claims that an object was unlawfully appropriated during the Nazi era without subsequent restitution.

ACCESSIONS

Accessioning is the procedure that is initiated by the transfer of clear title, and that officially incorporates objects into the permanent collections of the DMC. Title is considered to be transferred when the DMC receives a deed of gift signed by the donor, or when a bill of sale is acknowledged as paid in full in the case of purchased objects, or when a document is signed by all interested parties in the case of transferred objects.

Objects are not incorporated into the DMC's collections until they are accessioned. Upon accessioning, the DMC assumes the obligation for the proper care and management of the object(s). Accessioning provides an inventory of objects owned by the DMC, and is a function of the DMC Registrar.

1. All items acquired for the permanent collection of the DMC will be accessioned in a timely manner.
2. Complete records of the accessioned holdings of the DMC are maintained by the Registrar. Once an object or collection is reviewed by the Collections Committee, approved by the Executive Director, and a signed deed of gift or receipt, in the case of purchased objects, is received, then the object(s) or collection is accessioned by the Registrar into the collection. Accession numbers document DMC ownership or stewardship and are an inventory control device for the Registrar.
3. The accession number system utilized by the DMC is alpha-numeric and includes the calendar year of acceptance, followed by a number indicating the order of acceptance. The calendar year is written in full, and the number of order of acceptance is separated by a period from the year (e.g., 2000 .1). Each accession, whether it consists of a single object or collection of objects, is assigned one unique accession number.
4. Accessioning is the responsibility of the Registrar, and only the Registrar has the authority to assign accession numbers. It is the responsibility of the Executive Director to provide all acquisition and identification documentation to the Registrar.
5. The Collections Committee has final authority regarding accessions.
6. Undocumented objects found in the collections are those that have no accession number and no record of the object being accessioned or why they are in the DMC. Ownership of undocumented object(s) **cannot** be assumed and they **cannot** be disposed of or accessioned. These objects are abandoned property and the Michigan law (LOST PROPERTY Act 273 of 1987) for abandoned property and old loans must be followed in order to gain clear title. Once clear title is established, the object(s) undergo the following acquisition review :
 - a. A signed deed of gift for those objects donated to the DMC; proof of ownership for those objects received by the DMC (e.g., a police report documenting transfer of ownership to the DMC); or a letter from the trading/exchanging Institution transferring title of the object(s) to the DMC is required.

- b. A complete record of all correspondence and transactions involving the accession includes:
 - i. Name and address of the seller or trading/exchanging institution.
 - ii. Copy of the permit for field-generated collections from foreign countries.
 - iii. Import and export papers for object(s) or collections from foreign countries.
 - iv. Bill of sale and bill of lading.
 - v. Any gift restrictions.
 - vi. Copyright considerations.
 - vii. Artist's rights considerations.
 - viii. Provenance information.
 - ix. History of object(s).
 - x. Dates or ages of object(s).

- 7. Black and white or color photographic images, digital images, or video recordings with the assigned accession number visible either in the photograph(s) are required for designated objects. This requirement is to include all type specimens, all works of art, all ethnographic material, and other objects selected by the Executive Director in consultation with the Registrar.

DEACCESSIONS

Deaccessioning, when carried out in an appropriate manner, is an integral part of museum professional practice. This view is endorsed by the DMC in its Code of Ethics and is based upon ethical codes of national and international museum professional organizations. As the museum profession has developed, so have scholarly mechanisms for building on the experience of the past. Deaccessioning is a useful tool for defining and refining the scope and quality of collections that have grown over the years. The existence of a deaccession policy should not, however, be taken to imply that collections are a resource for the purpose of raising revenue to cover operating costs.

Such action quickly undermines the concepts of fiduciary responsibility and public trust. The deaccessioning of an object by sale can only occur in particular circumstances, and the revenue raised from such sales is restricted in use.

The DMC recognizes the special responsibility associated with the receiving and maintenance of objects of cultural, and historical significance in the public trust. An institution cannot remain static and serve the cultural and educational needs of its various communities.

Periodic reevaluations and thoughtful selection are necessary for the growth and proper care of collections. The practice of deaccessioning under well-defined guidelines provides these opportunities. Deaccessioning permanently removes an object from the collections through donation, transfer, exchange, sale, repatriation, loss from collections, deterioration beyond repair, and loss through natural disasters, and allows the transfer of unrestricted title to the receiving agency.

Objects under consideration for exchange from another institution are subject to the Collections Committee review process. An object must have been accessioned into the DMC's holdings for at least three years before it can be considered for deaccessioning, unless otherwise regulated by state and federal law.

1. A number of reasons create the need for careful removal of properly reviewed objects from the DMC collections. The deaccessioning of any object, for whatever reason, is of primary importance to the DMC. The only material considered for deaccession is that to which the DMC has clear title.
2. No object is deaccessioned and disposed of by transfer, exchange, sale, or destruction, or in any way removed from the DMC records without careful review, evaluation by DMC staff, and documentation of clear title.
3. The Collections Committee also functions as the Deaccessions Committee. Initial recommendations in writing come from the appropriate DMC staff member.
4. As a courtesy, reasonable efforts will be made to contact donors or their heirs, and living artists prior to the deaccessioning of objects from the DMC's collections.

5. The decision to deaccession is made based on, but not limited to, the following guidelines. These guidelines assume that all objects currently are accessioned and that the DMC has clear and unrestricted title:
 - a. Objects lacking provenance or that are not significant or useful for research, exhibit, or educational purposes in and of themselves.
 - b. Objects that have been determined not to be authentic.
 - c. Objects that have limited or no value to the DMC because of redundancy in the collection.
 - d. Human skeletal remains and objects of sacred or ritual significance that are requested for return under the terms and conditions of any state, federal (NAGPRA), or international laws and statutes. As per current federal laws and statutes, the requesting group must provide evidence of the validity of their claim. All claims must be made in accordance with national and international statutes and laws and the DMC will respond accordingly.
 - e. Objects that do not relate to the stated mission of the DMC. Objects that do not fit the stated scope of collections.
 - f. Objects that have decayed or decomposed beyond reasonable use and repair or that by their condition constitute a hazard to other objects in the collection.
 - g. Objects reported as missing or stolen.
 - h. Objects that have been stolen and for which an insurance claim has been paid to the DMC.
 - i. Objects used in education programs.
 - j. Objects that were accessioned erroneously into the collections.
6. The preferred method of disposal is transfer or exchange of objects to or with appropriate public museums, after which the order of preference is appropriate public educational agencies and institutions, private museums, and private educational agencies and institutions. Every effort is made to retain objects of regional or local importance in the public sphere. In the event of transfer to or exchange with either public or private institutions, the DMC requires evidence that proper care will be provided for the objects.
7. If transfer is not feasible, objects may be sold through standard state procedures. Under no circumstances will ethnographic objects be sold.
8. In instances of sale, no member of the NMC Board of Trustees, NMC staff, DMC staff, faculty, students, volunteers, or members of DMC committees, will be eligible to purchase deaccessioned items. Under no circumstances will this restriction be waived.
9. Any funds realized from deaccessioned objects may only be used to acquire additional artworks for the collection. Funds may not be expended for any other purposes, including but not limited to: staffing, construction, capital equipment, and other non-acquisition expenses.
10. Funding for newly acquired and accessioned objects are attributed to the original donor(s).

11. If a suitable recipient for a proposed deaccession and disposal through transfer, exchange, or sale cannot be found, the DMC must keep and maintain the objects until such time as a suitable recipient is found.
12. Objects that have decomposed must be destroyed in an appropriate manner.

CATALOGING

"Cataloging" is to identify and describe in detail through methodical classification each object and provide it a unique identifying number. Cataloging is part of documentary control of the collections, placing the object into proper context and determining information important and unique to that one object. The catalog provides a centralized place for all known documentation of an object for effective management.

The DMC maintains a unified cataloging system, with cross-reference between accession and catalog numbers. That system is electronic, with collection records backed -up on a periodic basis. Terminology is standardized and codes are not used. The catalog records both intrinsic and associational information in a standard format. The standardized categories basic to all collecting divisions are supplemented by additional categories that customize the catalog to each division.

1. All accessioned collection objects are cataloged in a timely manner.
2. Complete records of the cataloged holdings of the DMC are maintained in the Registration division. Catalog numbers document classification and scholarship and are an inventory control device for the DMC Registrar.
3. The catalog number system utilized by the DMC is alphanumeric and includes the calendar year of acceptance, followed by a number indicating the order of acceptance. The calendar year is written in full, and the number of order of acceptance is separated by a period from the year (e.g., 2000.1). Each accession, whether it consists of a single object or collection of objects, is assigned one unique accession number. The catalog number is written in full on the object.
4. Cataloging is the responsibility of the DMC Registrar, and only the DMC Registrar has the authority to assign catalog numbers within the appropriate collecting division.
5. Objects may not be loaned until they are accessioned and cataloged.
6. Non-accessioned objects (i.e., hands-on "disposable" teaching collection and exhibition props) shall be clearly identified with permanent markings as "not accessioned" so as to differentiate these objects from permanent collection and campus art objects. These objects need not be cataloged in the electronic database or paper record system.

INVENTORY

Inventory provides accountability, updates collection records and documentation, provides the opportunity to check the condition of each object/specimen, and aids in maintaining the security of each collection. Inventory is the physical verification of the presence, location, and condition of the objects for which the DMC has assumed responsibility. By conducting inventories, the DMC better fulfills its legal and ethical responsibilities.

1. The DMC practices four types of inventory (accessions, comprehensive, spot-check, and relocation):
 - a. Each **accession** must have an accounting of the incoming objects and documentation to provide a baseline. Accessions inventory is the responsibility of the DMC Registrar.
 - b. A **comprehensive** inventory is conducted once every 5 years accounting for all objects.
 - c. A **spot-check** inventory is conducted on a regular basis as needed for a specific group of objects, cabinet, or shelf. Spot-check inventory is the responsibility of the DMC Registrar.
 - d. A **relocation** inventory is conducted any time an object or collection is moved. Relocation inventory is the responsibility of the DMC Registrar.

LOANS

Borrowing and lending objects are inherent practices in a museum and require specific procedures to ensure appropriate object management. Loans do not involve transfer of title but are the temporary reassignment of objects from the DMC (outgoing) to another institution or to the DMC (incoming). All loans are for a defined period of time and for the stated purposes of exhibition, research, education, or inspection. Third party or permanent loans and commercial use of loaned materials is prohibited.

1. Loans are by authority of the Executive Director and effected through the DMC Registrar. Loans are initiated by the Executive Director and transmitted in writing for processing to the DMC Registrar. A written loan contract must accompany every loan with specifications on rights and responsibilities of each party. The loan contract must stipulate the conditions of the loan to insure adequate storage, environmental protection, and safety precautions during transit, handling, and use. Loan contracts are kept on file in the Office of the Registrar with a copy in the Executive Director's files. It is the responsibility of the DMC Registrar to notify the Executive Director of the return and completion of a loan. The DMC Registrar establishes the procedures for packing and transportation of all loans.
2. All loan activities (outgoing or incoming) that require a financial or physical commitment by the DMC of other than a minimal nature, or obligates the DMC to other than normal investment in the care, maintenance, or protection of an object, must be approved by the Executive Director.
3. The loan number system utilized by the DMC is alpha-numeric and includes the letter L (for loan), followed by the calendar year of the loan, followed by a number indicating the order of loan. The calendar year is written in full, and the number of order of acceptance is separated by a period from the year (e.g., L2000.1). Each loan, whether it consists of a single object or collection of objects, is assigned one unique loan number. Loan numbers apply to both outgoing and incoming loans.
4. The purposes for which the DMC may release an object to another institution as an outgoing loan are as follows:
 - a. For exhibition as part of a temporary installation or loan exhibition.
 - b. For research, destructive analysis, or related educational purposes for stated institutional purposes.
 - c. For conservation, identification, or examination.
5. The purposes for which the DMC may accept an object as an incoming loan are as follows:
 - a. For exhibition as part of a temporary installation or loan exhibition.
 - b. For research or related educational purposes for stated DMC purposes.
 - c. For inspection and study with regard to possible donation or purchase.

I. Outgoing Loans

DMC collections are maintained for the benefit of the public and objects are loaned to reach a wider audience and facilitate research. While on loan, objects must be afforded the same level of care and protection as provided by the DMC. Because of these considerations, loans are made only to other similar institutions, non-profit agencies, and educational organizations.

1. Objects considered for loan are the property of the DMC and accessioned into the DMC's records. Unaccessioned or uncataloged DMC collections will not be loaned. The Executive Director may further restrict the kinds of objects or materials eligible for loans based on nature, rarity, monetary value, research priority, and/or management considerations of the objects.
2. The DMC maintains proprietary rights over the object(s) loaned.
3. To ensure objects requested for loan receive proper care and security, the requesting institution must present verification of their environmental, storage, exhibition, and security conditions and procedures for the handling and transit of objects by way of a standardized AAM General Facilities Report. Objects must be packed and transported in the safest possible way in accordance with the nature and condition of the objects.
4. The loan period is typically six months with options to renew. No objects shall be on exhibition loan for longer than one year. Traveling exhibits may warrant a contract for a longer loan period. Returned loan objects undergo inventory and evaluation before being loaned again.
5. Only the DMC Registrar can assign a loan number. The DMC Registrar is responsible for completing a condition report prior to outgoing shipment of a loan and after its return to the DMC. The DMC Registrar is responsible for providing appropriate information to the borrowing institution relating to a loan. Insurance claims for damaged or lost objects are the responsibility of the Executive Director. Objects on loan cannot be altered, cleaned, or repaired unless permission to do so is authorized in writing by the Executive Director on the loan agreement.
6. All objects sent out on loan are insured wall-to-wall. Normally, insurance coverage is provided by the borrowing institution. Current and reasonable insurance valuations are the responsibility of the Executive Director. All other insurance matters are the responsibility of the DMC Registrar. Under most circumstance, insurance is all risk, wall-to-wall coverage. A certificate of insurance is required from the borrowing institution prior to transportation of the loaned objects.
7. The DMC Registrar is notified when cancellation of or changes in insurance coverage occur. The loan then may be subject to cancellation. Failure to maintain adequate insurance coverage in no way releases the borrowing institution from liability for loss or damage regardless of whether or not the DMC monitored the borrowing institution's insurance.

8. Insurance is a component of a broader risk-management program of the DMC and NMC that supports overall preservation efforts of the DMC.
9. If the borrowing institution is unable to provide insurance, a request for an exception must be made in writing by the DMC Registrar to the Executive Director.
10. Objects on loan must be returned promptly when the loan period expires. The DMC reserves the right to cancel or deny renewal of any loan.
11. Loans that will radically alter or destroy an object (destructive analysis loans) may be permitted only with the written approval of the Executive Director.
12. Except for condition reports, all photography, reproduction, or replication of borrowed objects must be with prior written approval by the Executive Director with notification to the DMC Registrar. Lighting conditions, environmental and/or applied chemical alterations, and other conditions of reproduction and replication must be specified by the DMC Registrar on the loan agreement. Photographs, reproductions, and replicas may only be used for research, exhibition, and educational purposes.
13. The DMC must be credited in all publications and exhibitions associated with the loan object, including photographs and reproductions, and must receive two (2) copies of any publication. The object(s) should be identified by its catalog or accession number.

II. Incoming Loans

1. The DMC may receive loans from institutions or individuals. If the lending institution or individual does not provide a loan agreement, the DMC will use its incoming loan agreement to document the incoming loan. The DMC exercises the same care with objects on loan as it does with its own objects.
2. No object will be accepted on loan that has been acquired by illegal and unethical means. Loan objects can be received only from the legal owner or authorized agent.
3. Objects will not be received on loan from DMC staff members, the NMC administration, the NMC Board of Trustees, or their immediate families.
4. All incoming loans must be insured. It is the responsibility of the DMC Registrar to make appropriate arrangements for insurance of the loan objects. All incoming loans that are insured must include the provision that the amount payable by the insurance company is the only recoupment available to the lender in the event of loss or damage. If insurance is waived, a written agreement by the lender to waive insurance and release the DMC from any liability associated with the loan must be on file prior to receipt of the loan.
5. It is the responsibility of the lender to set insurance valuations. The type of valuation must be stated on the loan agreement (fair-market, replacement, conservation, material, or special consideration).
6. The DMC does not provide evaluations or appraisals for a loan object(s).
7. Loans of personal property from individuals for warehousing in the DMC will not be considered.
8. The DMC Registrar may require the lending party to certify that the loan object(s) can withstand ordinary strains of packing, transportation, and handling. The Registrar may request that the lending party send a written condition report prior to the transportation of the object(s). It is the responsibility of the DMC Registrar to monitor the condition of the loan object(s).
9. Upon receipt of the loan by the DMC Registrar, the object(s) must be inventoried, inspected, photographed, and written notations made of the findings.
10. Any inconsistency in the loan inventory or any change in the condition of the loan object(s), must be reported immediately to the DMC Registrar. The DMC Registrar must notify the lending party and, when appropriate, notify the insurance company and prepare a full condition report. It is the responsibility of the Executive Director to handle claim negotiations.
11. The DMC Registrar is responsible for the prompt return of the loan object(s). The object(s) must be inventoried, inspected, photographed (where appropriate), and written notations made of the findings.

12. The DMC reserves the right to cancel a loan or remove the loan object(s) from exhibit at any time. All loans are for a set period of time that cannot exceed two years.
13. Packing and shipping arrangements of a loan object(s) are the responsibility of the DMC Registrar.
14. The DMC Registrar may notify a lender of the DMC's intent to terminate a loan for an object(s) for which a written loan agreement exists that was made for an indefinite term or for a term in excess of seven years.
15. Property on loan to the DMC for fifteen years or more, and for which no written loan agreement exists, and to which no person has made claim according to the records of the DMC, is considered abandoned and subsequently owned by the DMC. This policy is subject to all laws concerning Michigan abandoned property.
16. Loans are returned to the lending party identified on the loan agreement at the stated address unless an authorized agent of the lender has given notice of change of ownership or location.

III. Campus Loan Program

The DMC's Campus Loan Program is provided as an outreach service to departments and individuals on campus at Northwestern Michigan College. The works available for the Campus Loan Program will be drawn from designated objects in the collection. They will include works by current faculty, faculty alumni, current students, and student alumni, as well as works that the DMC is not likely to display in the DMC exhibition spaces.

Authorization of Loans

Campus loans are subject to the approval of the Executive Director and will be determined on a case-by-case basis.

Interested campus units will submit a letter of request. The DMC Registrar will perform a site visit and risk assessment of the display location. The results of the visit will be shared and discussed with the Executive Director, and selection of appropriate objects will be determined. The DMC Registrar will share the list of works deemed appropriate to borrowing agency. Once the borrower has selected works that they are interested in borrowing the Executive Director will consider approving the selection. If the selection is approved a loan agreement will be drawn up and installation will be arranged with the borrower. Loans are available for areas with both reasonable security and access by the public such as reception areas or administrative offices. They will not be considered for students or residential use, private offices, dining halls, kitchens, corridors, or bathrooms.

The DMC will not charge a loan fee to the borrower.

Loan Conditions

The DMC Registrar will make installation or de-installation arrangements at a time convenient to both parties.

Objects must be installed and de-installed by DMC staff. All objects must be securely installed and display methods determined by the DMC must be adhered to. No foreign materials (i.e., pins, nails, etc.) are to be used to fasten an object for display purposes.

Objects may not be removed from display or relocated without the permission of the Executive Director, unless the movement is in an emergency in which the object may be damaged if immediate action is not taken. This includes relocation of an object to a different location within the borrowing area and return of the loan.

Loan objects are to remain in the condition in which they are received by the borrower. Objects may not be unframed, removed from mats, mounts or bases, cleaned, repaired, retouched, or altered in any way whatsoever. DMC numbers or tags may not be removed.

Loan objects shall be protected at all times against theft, fire, exposure to water, excessive humidity, excessively dry conditions, and food or liquids, as well as from direct or reflected sunlight, strong artificial light, fluorescent light, or proximity to heat sources. Objects may not be sited near heating ducts, pipes, space heaters, or humidifiers.

Should loss, damage, or deterioration be noted while on the borrower's premises, the DMC shall be informed immediately. If possible, damaged objects should remain in situ until DMC staff can visit the site and determine the best method of removal.

If renovation or any other facility work is to take place at the site where the loan object is installed, all artwork in the area must be returned to the DMC for the duration.

Insurance

Each object will be insured under the DMC's fine art policy for the current fair market value determined by the DMC. The value of loaned objects is confidential and may not be released by the borrower to any other party without the DMC's express permission.

Loan Period

Objects shall remain in the custody of the borrower for the term stated on the loan agreement. Upon completion of an inventory and condition report, campus loans may be renewed provided the condition of the work warrants its continued display.

The DMC reserves the right to recall any object for its own purpose upon reasonable notice to the borrower. The replacement of recalled object(s) is at the discretion of the Executive Director.

Borrowers may not loan objects to other offices or individuals. If a loan object is no longer desired, the DMC Registrar must be contacted to arrange for its return.

The DMC Registrar should complete an inventory and condition report for each object periodically.

Photography

The object(s) may not be photographed or reproduced in any way. The DMC may not be the holder of all rights associated with the object(s), such as copyright, and additional clearances from outside organizations may be required prior to reproducing the object(s); therefore, all rights and reproduction requests for loaned objects should be referred to the Executive Director.

COLLECTIONS CARE

The purpose of collections care is to preserve well-maintained and well-documented individual objects and collections as a whole. The goal of collections care is to limit deterioration of the collections.

1. The DMC cares for its collections through a variety of preventive conservation and risk management strategies. These are applied on a variety of levels, from the DMC's environment as a whole, to collections areas, and to individual collections housing and packaging units. The following strategies are used to provide proper care of collections:
 - a. Regulated and monitored temperature, relative humidity, and atmospheric pollutants.
 - b. Low and filtered light levels.
 - c. Integrated pest management.
 - d. Archival housing units that provide a buffer between collections and the environment.
 - e. Archival packaging materials that provide a buffer between collections and the environment.
 - f. Preventive conservation.
 - g. Routine preventive maintenance.
 - h. Safe handling and moving of collections and an integrated record-keeping system.
 - i. Insurance.
2. Incoming objects must be evaluated for cleanliness during the accessioning process. They are cleaned only if they can withstand the process and use of solvents. Dirty objects that cannot withstand the cleaning process must be encapsulated before they are placed in collections areas.
3. All packaging and housing materials used to containerize objects must be chemically stable and free from acids or additives.
4. All housing units must be chemically stable and be of sufficient strength to support the weight of the objects that they house. They must be able to accommodate a variety of materials and sizes of objects.
5. Collections records must be made in a timely manner, housed in a secure location, provide for easy retrieval of information, and be preserved by proper handling and storage. A duplicate copy of information must be made on a regularly scheduled basis and be stored in a secure off-site location.

I. Preventive Conservation

Preventive conservation philosophy underlies the collections management practices at the DMC. Through the practice of preventive conservation, the DMC prevents and limits deterioration of collections due to environmental, human, and inherent factors. Concerns for the preservation of individual objects are at the heart of any decision relating to their use.

1. Crucial to the success of preventive conservation is the provision of a stable DMC environment. The DMC's internal environment is monitored and controlled throughout the buildings, with additional monitoring in collections housing and exhibition areas. Temperature, relative humidity, and light are monitored and regulated on an ongoing basis.
2. All materials used for packaging and housing the DMC's collections are stable and non• reactive, as are materials used for constructing exhibit mounts and supports. Use of any exhibit construction material that is not stable requires a stable barrier material to be placed between it and collections objects.

II. Safe Handling

Safe handling and movement of collections objects is practiced at all times in the DMC. All DMC objects are treated with equal care, regardless of their monetary value. Safe handling minimizes risk to objects and supports preservation standards at the DMC.

1. In general, safe handling involves the preparation of appropriate space to receive the objects prior to a move, preparation of the route along which the object will be moved, and use of appropriate moving equipment with an appropriate number of DMC personnel safely to carry out the move.
2. All objects are evaluated individually before they are handled, packaged, and shipped in order to determine if they are sufficiently stable to withstand each activity. Handling, packaging, and shipping methods are chosen based on the individual requirements and sensitivities of the objects.
3. The shipping method chosen to transport objects must provide the best protection from reasonably anticipated risks and the shortest en route time.
4. The packaging materials chosen must provide adequate and appropriate protection from all reasonably anticipated risks associated with a particular shipping method.
5. Cushioning material chosen is based on the individual needs and sensitivities of objects; materials that provide superior cushioning properties may not necessarily be archival in nature but materials that have direct contact with the surface of the object must be archival.

III. Conservation

Even under the best-managed conditions, deterioration or damage will inevitably occur to collection objects. In such circumstances, conservation may be necessary.

Conservation is a continuing responsibility and is focused on the object. It is an intervention measure designed to return a deteriorated or damaged object to stability through reversible and minimally intrusive methods. The DMC endorses the conservation philosophy of minimal chemical and physical trauma to the object, use of sympathetic materials, the principle of reversibility, the compatibility of materials, and the keeping of complete and accurate records of the conservation process.

Conservation work with an outside conservator is conducted under a well-defined, comprehensive agreement between the DMC and the conservator. The DMC monitors the conservation process whether conducted in-house or on loan to an outside conservator to ensure the correct use and safety of the object, and to note in the records the returned stabilized materials. Monitoring can take place via email, phone, or other means of digital or in-person communication.

RECORD KEEPING

Documentation of the collections is an essential element in the sound management of the DMC's collections. This control allows for the easy retrieval of information, location of the object, and the object itself. It provides the foundation for knowing what is in the DMC's holdings and tracking collections activities.

Documentation is maintained in digital and paper formats that are housed by the Registrar. Backup copies are made on a regularly scheduled basis and maintained off-site. Legal activities (transfer status, accessions, deaccessions, loans, insurance) concerning the collections are the responsibility of the DMC Registrar. Retrieval is through the use of the accession number, catalog number, or loan number as appropriate. Inventory is conducted using one of these numbers as appropriate. Accession and loan numbers are by year; catalog number is by a sequential count.

The DMC produces and maintains written documentation for the following collections management activities.

- a. Transfer of title.
- b. Accessioning.
- c. Deaccessioning and method of disposal.
- d. Cataloging.
- e. Loans (incoming, outgoing, and in-house).
- f. Destructive loans.
- g. Insurance.
- h. Condition reports.
- i. Inventory (accessions, spot-check, relocation, comprehensive).
- j. Conservation treatment.
- k. Monitoring records for environmental control.
- l. Integrated pest management.
- m. Still or moving images where appropriate.

INTEGRATED PEST MANAGEMENT

The damage caused by pest infestation and the actions that must be taken to eradicate the infestation within the DMC can be lessened or mitigated through integrated pest management. Integrated pest management provides an ecosystem level approach to the management of pests that is based on cooperation and participation of all staff within the DMC to eliminate or minimize the causative agents of a pest infestation, namely food, moisture, and availability of pest habitat.

1. Through the combination of education, vigilant housekeeping, environmental monitoring, habitat modification, inspection, identification of infesting species, and application of specific treatment methods, integrated pest management is an effective tool in preventing the intrusion of pests into collection and exhibit areas. By preventing access to pests, the need for chemicals harmful to collections, staff, and visitors is eliminated.
2. Integrated pest management is carried out first by determining the extent of biological activity through monitoring, inspection, and identification. If the occurrence of pests within the DMC is detected, appropriate steps are taken to eradicate the pest in a non• or least-toxic manner. Treatment methods are followed by appropriate evaluation techniques.
3. The following integrated pest management strategies are practiced:
 - a. Exclusion of pests from the DMC.
 - b. On-going monitoring and detection.
 - c. Habitat modification.
 - d. Identification and isolation of infesting species when discovered and isolation and encapsulation of infested objects.
 - e. Treatment and suppression of species through non-toxic or least-toxic measures.
 - f. Evaluation of the effectiveness of the integrated pest management program.
 - g. Continued education of staff regarding integrated pest management.
4. Integrated pest management strategies should encourage on-going maintenance and housekeeping activities that include restriction of food and plants and regular cleaning of collection housing rooms and other areas. The collections rooms should be cleaned thoroughly at least once every six months and all collection rooms and other areas checked once a month for any signs of pest activity.

COLLECTIONS ACCESS

The DMC carefully controls access to collection areas. Control of access to the public, researchers, and DMC employees limits the opportunities for unauthorized use, damage, loss, theft, and/or destruction of collections. It also aids in the control of human traffic in collections housing areas.

1. Keys are only issued to DMC staff. Keys are not issued to volunteers or visitors.
2. Security measures must be in place for access and reducing harm to the collections. Controlled access includes signing in and out, issuance of keys, identification badges, keypads, and security cameras. Reducing harm includes housekeeping, an integrated pest management system, HVAC system, emergency preparedness, preventive conservation and collections management best practices, recordkeeping, and insurance.
3. Collections available for research are those that have been accessioned and cataloged. Access for research purposes is controlled by a research design.
4. In general, researchers, donors, students, indigenous groups, or others seeking access to collections must first present a request to the Registrar who evaluates the risk.
5. Collections research is conducted in the presence of museum staff. The person making the request has access only to the objects or collection requested. A relocation inventory is required when materials are moved into the secure room and when moved back into the housing room at the completion of the request.
6. Access to collections areas by museum staff, security personnel, and custodial staff is controlled by background checks at the time of hiring.
7. New staff receive training regarding the requirements and responsibilities of their position with regards to collections access. This training is supplemented on an annual basis.
8. Access is granted on authorization of the Registrar or the Executive Director. Access to collections is ultimately at the discretion of the Executive Director.

COLLECTIONS SECURITY

The purpose of security is to protect collections against a variety of risks. The goal of security is to limit damage or loss of collections.

1. The safety and security of the personnel and collections housed in the buildings and on the grounds of the DMC must be maintained. The DMC provides security for its collections through the following risk management strategies that are used to provide proper security for collections:
 - a. Systems and devices for deterring and detecting intruders.
 - b. Insurance.
 - c. Emergency preparedness (DPLAN)
2. Granting of access (authorization to enter a restricted area) and key issuance (control method for authorized access) is the sole prerogative and authority of the Executive Director.
3. Access to areas other than public spaces is restricted to the DMC staff, students, and volunteers. Only paid NMC staff may be issued keys to DMC facilities. Unpaid staff and non-DMC personnel may be allowed access under specific conditions and with supervision by paid DMC staff. All keys (mechanical or electronic) to DMC spaces may not be duplicated.
4. The access and key needs of each staff, association, or faculty member, student, research associate, or volunteer will be assessed by the Executive Director prior to access being granted or keys issued. Normally, access or key permits will be only for those areas to which the person is assigned during regular working hours, and will not include after-hours access. After-hours security access may be granted only by the Executive Director, and only in exceptional circumstances.
5. The Executive Director may request access or key permits for persons under their supervision, and they are responsible for any access granted or keys issued at their request. The Executive Director is responsible for any actions of the person(s) granted access or keys.
6. Key requests, issuance, turn-in, and safe storage are the delegated responsibility of the Executive Director.
7. Transferring or loaning of keys is prohibited. Persons who transfer or loan keys are responsible for the actions of the borrower and may forfeit all subsequent access or key permits, be charged for re-keying costs, face immediate termination of access or key permits, and, in the case of students and former students, have transcripts withheld or be denied future registration applications.
8. Volunteers and non-employed students shall not be issued keys.
9. The Executive Director may direct security personnel to allow access to a DMC area when the Executive Director or DMC Registrar is not available.

10. All unattended doors of ingress/egress/passage to the collections areas will remain locked and be key-accessed only. Doors may not be blocked open or left unlocked.
11. All keys must be returned to the Executive Director's office at the conclusion of the access period, termination of employment, completion of course work, or upon the order of the Executive Director.
12. Loss or theft of keys is to be reported immediately to the Executive Director.
13. The making or issuing of copies of keys to any portion of the DMC is solely by authority of the Executive Director.

EMERGENCY PREPAREDNESS

Emergency preparedness for the DMC focuses on reduction of risk and the mitigation of catastrophic events that have the potential to endanger people and collections. Emergency preparedness aims to anticipate and avoid emergencies, to regain control when an emergency occurs, and to recover control as quickly as possible should it be lost. The DMC abides by the emergency preparedness plan of NMC in the event of a disaster.

1. Disasters are prevented as far as possible through the practice of emergency preparedness measures such as inspections of entire facility and systems and preventive maintenance of the facilities, systems, and equipment.
2. Emergency preparedness measures are based on risk analysis of locally occurring hazards.
3. The written emergency preparedness plan (DPLAN) is tested and evaluated annually during the summer months.
4. The plan addresses measures to be taken before, during, and after an emergency.
5. The DMC Registrar maintains emergency supplies and inventories them annually during the summer months.

PERSONAL COLLECTING

The professional reputation of the DMC is a valuable asset and is reflected by the professional and ethical activities of its staff and volunteers. DMC personnel should avoid the appearance of unethical, unprofessional, and potentially compromising practices that may cause the DMC to lose credibility. In issues that are legally defined, the DMC expects the employee to abide by the law, and in those cases where the legal limitations are unclear, professional and ethical behavior serve as a guide.

1. The collecting of objects is not in itself unethical, but accumulating a collection in an area associated with the employee's gallery-related duties raise ethical concerns. Every member of the DMC staff is entitled to a level of personal independence consistent with professional and staff duties and responsibilities. However, as a person with a role of public trust, no member of the gallery profession, gallery volunteer, or trustee can be wholly separated from the institution of hire or other official affiliations.
2. Therefore, such persons must be concerned not only with personally motivated conduct and interests, but also with the way such actions might be construed by others. All personal collecting transactions, particularly when dealing with objects similar to those collected by the DMC, require extreme discretion. The staff, volunteers, and board of the DMC should not compete or appear to compete with the DMC for the acquisition of any object.
3. An employee acquiring an object that falls within the scope of the DMC's collections should inform the Executive Director. If the DMC considers the object of interest or value to the collections, it should be offered to the institution at the purchase price plus any reasonable incidental expenses. This policy excludes objects that are readily available on the open market.
4. It is the responsibility of each DMC employee, volunteer, and board member to exercise reasonable care to avoid conflicts of interest in activities relating to their positions at the DMC.

RESEARCH

Scholarly activity and research is vital to the DMC's educational and public service mission. The purpose is to outline, delineate, and reinforce NMC policy with regard to the conduct of research and scholarly activity by members of the DMC staff and faculty. This statement also endorses research as an activity appropriate to the use of DMC collections and an integral part of the DMC's Collection Management Policy

1. In recognition of the importance of professional research activities, the DMC's administration normally does not intervene in the research or scholarly activities of a faculty and staff member except to render assistance. Situations may arise where it is necessary for the DMC administration to recommend suspension, modification, or termination of scholarly activity or research for adequate cause. Adequate cause for such action includes but is not limited to the following:
 - a. Demonstrated evidence of professional incompetence, supported by documentation.
 - b. Continuing or repeated substantial neglect of professional responsibilities.
 - c. Professionally unacceptable activity in the conduct of scholarly work (e.g. plagiarism, research fraud).
 - d. Endangerment of collections objects beyond professionally acceptable limits.
 - e. Creating a health or safety hazard for DMC faculty, staff, students, visitors, or volunteers.
2. The objects in the DMC's collections and their documentation, as well as their image and all additional documentation developed subsequently to their acquisition, are the property or stewardship of the DMC. Furthermore, any and all materials or items developed, written, designed, drawn, painted, or digitally produced or reformatted by the staff while executing their responsibilities as employees of the DMC also are considered to be the property of the DMC. These property rights shall continue after the employee ends their employment at the DMC.
3. To ensure academic freedom and professional research and scholarly opportunities, the DMC faculty and staff have the right to respond to actions that impede or prevent such activities.

EXHIBITIONS

An exhibition is the process of presenting one or more objects with accompanying interpretive and educational materials for the purpose of informing, inspiring, and providing dialogue for a defined audience. This kind of presentation is an appropriate use of the DMC collections and is an integral part of its mission.

1. The DMC's primary responsibility for exhibitions is the use of the collections for disseminating new information. The DMC is obligated to ensure that information in exhibitions is honest, objective, and accurate.
2. The DMC selects exhibits based on merit and scholarship.
3. Exhibitions should adhere to the concepts of public service and education while subscribing to standard practices in the museum field. The DMC does not authorize certain kinds of exhibitions. The following represents the kinds of exhibitions that are considered unacceptable:
 - a. Exhibitions that publicize or promote commercial products or services.
 - b. Exhibitions that willfully, with malice aforethought, impugn the reputation of any person.
 - c. Exhibitions that do not support the notion of human dignity.
 - d. Exhibitions that threaten the health and safety of the staff or visitors.
 - e. Exhibitions that are intended to promote and/or enhance a particular religious belief, attitude; or dogma.
 - f. Exhibitions that intentionally or unintentionally promote an attitude of prejudice against any person or persons.
 - g. Exhibitions that perpetuate myths or stereotypes viewed as negative or demeaning to a people, race, gender, religion, or ethnic group.
 - h. Exhibitions that compromise the artist's or scholar's rights.

REPRODUCTION AND COPYRIGHT

Use of images of DMC objects for research, exhibit, publication, programming, and publicity purposes is a common practice and, when used appropriately, such images serve to share DMC collections more widely.

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Adopted by the Northwestern Michigan College Board of Trustees January 27, 2020
Revised December 20, 2021