

Archaeological Curation in the Mississippi Valley Division: A Plan for Consolidation

St. Paul

Rock
Island

St.
Louis

Memphis

Vicksburg

New
Orleans

**Mandatory Center of Expertise
for the Curation and Management
of Archaeological Collections**

July 2015

Archaeological Curation in the Mississippi Valley Division: A Plan for Consolidation

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Mandatory Center of Expertise
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of Archaeological Collections**

U.S. Army Corps of Engineers, St. Louis District

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Executive Summary

The National Historic Preservation Act of 1966, the Archaeological Resources Protection Act of 1979, and 36 CFR Part 79, *Curation of Federally Owned and Administered Archeological Collections*, state that archaeological materials removed from federal lands remain the property of the U.S. government and that federal land managers are to ensure that these collections are preserved by suitable scientific or educational institutions possessing adequate curatorial capabilities.

Currently, MVD archaeological collections are ineffectively managed and improperly housed due to their dispersed locations and inconsistent administration. In February 2014, MVD command directed the Mandatory Center of Expertise for the Curation and Management of Archaeological Collections (MCX CMAC) to review the location, extent, and condition of MVD collections and to prepare a plan for consolidation that would include a program for cost-effective and efficient long-term curation (BG Peter A. DeLuca, 11 February 2013, CEMVD-PD-SP, Policy Letter Regarding Regionalization).

Under this directive, MCX CMAC, for the first time, reviewed collections status information that included ownership and long-term responsibility. MCX CMAC also reviewed repositories and funding strategies throughout MVD. A plan for consolidation was developed based on a critical review of the appropriate care required for collections and the need to achieve efficiencies. The study findings and recommended plan include the following:

- MVD archaeological collections totaling 4,200 cubic feet are housed in 22 repositories, and most collections require some level of rehabilitation. Through collections ownership research, the study identified a reduction in volume of 43% from the originally reported 7,300+ cubic feet in 48 repositories.
- The Corps is required by 36 CFR Part 79 to appropriately care for collections and to use “monies appropriated annually by the U.S. Congress” to fund curation. 36 CFR Part 79 is promulgated under the authorities of 16 U.S.C. 470aa-mm and 16 U.S.C. 470 et seq.
- Currently, each MVD district manages and administers their collections individually, with no consistency or standardization between districts or repositories. Centrally managing MVD collections through the MCX CMAC provides the greatest benefit to the collections and MVD districts.
- Under a regionalization model, MCX CMAC would consolidate the collections and be assigned the responsibility for MVD curation. The Center has the professional staff, experience, and knowledge gained from over 20 years of national curation and collections management activities.
- Eight repositories have expressed the desire to serve as an MVD regional center, and three of these currently meet the seven requirements outlined by MCX CMAC.
- MCX CMAC recommends three regional repositories for MVD collections—a northern, a central, and a southern facility—which will provide the most effective strategy for the division as a whole, while maintaining the best collections management environment and best customer service.
- MCX CMAC management of a firm-fixed-price contract for three regional centers, and MCX CMAC administration of the collections, would save MVD districts between \$1,015,000 and \$4,160,000 over the 5 to 20 years following consolidation.
- MCX CMAC is able to implement a phased consolidation plan for MVD collections over a period of five years for a total cost of approximately \$1,500,000. Annual O&M work plans/packages over and

above the budgeted MCX CMAC line-item can be prepared, submitted, and funded to implement the plan. Consolidation funding will include the cost to establish regional contracts, transfer collections, and provide in- processing fees that will include the first year of maintenance.

- Districts must budget for annual collection maintenance costs from the appropriate operating project or program, estimated to be between \$94,000 and \$131,000 for all MVD collections. MCX CMAC recommends districts provide the appropriate level of funding based on the proportion of collections for which they are responsible.
- The consolidation contracting and transfer process will take at least 12 months, and the initial in-processing fee will cover the first year of maintenance. Districts will therefore have at least 24 months to incorporate the maintenance costs into their annual budget cycle. Districts should begin now to budget for curation contract costs in FY17.
- Phased collection rehabilitation will take place through repositories and the Veterans Curation Program, in continuing support of our war fighters while ensuring proper collections care. Rehabilitation costs will be funded through the MCX CMAC.

1. Introduction

1.1 Background

In 1906, the Antiquities Act was passed by Congress as part of a group of acts endorsed by President Theodore Roosevelt and Congress that sought to preserve the country's national parks and historic and prehistoric objects that were deemed significant resources of our national patrimony. Since that time, federal land-managing agencies have been responsible for curating prehistoric and historic archaeological materials removed from sites located on federally owned or managed land. The Antiquities Act was followed by the Historic Sites Act of 1935, the National Historic Preservation Act (NHPA) of 1966, the Archaeological and Historic Preservation Act (AHPA) of 1974, and the Archaeological Resources Protection Act (ARPA) of 1979, which together clarified federal cultural heritage assets responsibilities. These public laws outlined the process by which federal land-managing agencies are to identify, protect, and evaluate archaeological sites and their associated documentation. The process ensures that these resources are available to the nation for scientific study, education, and exhibition.

Guided by the various statutes, most archaeological research over the last 60 years has consisted of scientifically based excavations to preserve artifacts and associated information that were in danger of being destroyed by large-scale federal construction activities. For the U.S. Army Corps of Engineers (USACE) in particular, large civil works projects in support of our water management and reservoir programs challenged the agency to develop complex archaeological recovery programs to document and preserve our nation's archaeological heritage. Significant efforts were made—and continue to be made—to document archaeological sites and to recover artifacts and associated documentation from the Corps projects. Major national efforts began with the Works Progress Administration archaeological investigations of the 1930s and 1940s and continued through the Smithsonian Institution River Basin Surveys of the 1950s and 1960s. In the 1970s and 1980s work for USACE districts began to shift to compliance projects conducted for mitigation under Section 106 of the NHPA.

The federally sponsored mitigation programs usually provided for the recovery of materials from archaeological sites, analysis of the recovered items, and publication and circulation of a final report. The placement of collections in repositories for preservation, display, future study, or education saw little consistency among federal agencies. Although required, little attention was given to the in-perpetuity maintenance and care of the collections once the archaeological programs were completed. Most collections were stored by universities and museums, with federal oversight generally absent.

By the early 1980s, however, it became apparent to many cultural resource managers that federal archaeological collections that were thought to be well managed, were in fact, dispersed across the country, in poor condition, and ignored. The lack of care precipitated the deterioration of collections that were stored in chemically unstable storage containers and in repositories lacking environmental controls, security, and adequate fire protection. As the collections deteriorated, so did their scientific value and usefulness to Native Americans, researchers, educators, and most importantly, the general American public. A valuable public resource detailing the Nation's prehistory and history was being lost through neglect.

In response to the damage being caused by neglect, in 1991 the National Park Service (NPS) published 36 CFR Part 79, *Curation of Federally-Owned and Administered Archeological Collections*. This regulation set minimum standards for the care of these scientific collections. The authority for the promulgation of 36 CFR 79 is found in 16 U.S. C. 470aa-mm and 16 U.S.C. 470 et seq. The regulation clarifies that federal agencies should fund curatorial services and activities “using monies appropriated annually by the U.S. Congress” (36 CFR §79.7a). From these and other actions, the importance of curating federal archaeological collections began to receive renewed attention across the federal government and within the Corps. Based on 36 CFR Part 79, USACE implemented its own standards for curation, ER 1130-2-433 (April 1991) and later in ER 1130-2-540 (November 1996). The federal and Corps regulations outline the specific requirements of the agency’s responsibility to house collection in a repository that has the capability to accession, label, catalog, maintain, inventory, and preserve collections for the long term.

Understanding the magnitude of the national curation problem, the St. Louis District (MVS) initiated a thorough study of its collections in 1988. This study found that MVS collections totaled over 2,000 cubic feet of artifacts and records that were stored at 10 different repositories across the United States. The majority of the repositories did not provide the level of care needed for the collections. The solutions identified within the study included coalescing collections into fewer repositories, developing curation contracts, establishing an annual funding stream within the District to care for the collections, and initiating a phased rehabilitation program for collections requiring upgrades.

The program established at St. Louis provided effective and efficient management of the collections, ensured that the collections were managed for continued preservation, but more importantly, organized collections so that they were more easily accessible and used by educators and scholars. Initially, St. Louis District collections were coalesced at two repositories, and in 2004, all St. Louis District collections were transferred to a single repository under a single firm-fixed-price contract.

Following the dissemination of the results of the St. Louis study throughout the Corps, other Corps districts and divisions began to understand that the condition, location, and extent of the overall universe for Corps archaeological collections were unknown. As St. Louis District initiated their study recommendations in a phased manner, HQ USACE recognized the need to address archaeological collections across the Corps in a standardized manner, and so in 1992, St. Louis District was designated a USACE technical center of expertise (TCX) for archaeological curation. In 1994, the TCX was elevated to a Mandatory Center of Expertise for the Curation and Management of Archaeological Collections (MCX CMAC). MCX CMAC is dedicated to addressing aspects of archaeological collections management and management oversight for Corps-wide compliance with 36 CFR Part 79

1.2 Curation in USACE

1.2.1 USACE’s Collection Universe

After its inception, the Director of Civil Works directed MCX CMAC to conduct a general inventory and assessment of all Corps civil works archaeological collections, modeled after the work done for its own district. This 1999 survey identified over 47,000 cubic feet of archaeological artifacts and over 3,200 linear feet of associated documentation in civil works archaeological collections from over 500 lakes, reservoirs, and levee and flood-protection projects within 44 states.

Artifact collections include, but are not limited to, prehistoric stone tools, pottery, faunal material, botanical remains, bone tools, human skeletal remains, shell, and a variety of archaeological samples (e.g., flotation, soil, and charcoal), and historic metal, glass, ceramic, plastic, and leather items. Associated documentation, including, but not limited to, maps, field notes, drawings, field journals, photographs, and administrative records, comprises the rest of the USACE archaeological collections. ***These materials are non-renewable resources, and the ability to learn about the past rests with properly preserving this material for education, research, and interpretation. The Corps' large archaeological collection is a significant and important national scientific collection.***

Current MCX CMAC data show that there are over 150 repositories housing USACE collections across the Nation. Of these collections, less than 10% of artifact and record collections are housed to federal standards, and only 5% of the Corps collections have annual funding dedicated to their support and care. The dispersed locations of these collections makes comprehensive management and oversight difficult, and over time, the collections have deteriorated.

1.2.2 Current Operations

Funding for USACE curation activities is authorized by 36 CFR Part 79, subject to “any specific statutory authorities or limitations applicable to a particular agency” (36 CFR§ 79.7a). Currently, MCX CMAC receives funding to assist districts with curation assessments and contracting, as well as to address the necessary rehabilitation of collections. However, long-term curation efforts are managed by individual districts, and most district cultural resources staff are professional archaeologists, not subject matter experts in archaeological curation and records management. The policies and procedures employed by districts within MVD and across the nation for collections care vary widely, with no consistency in funding, oversight, or a standard inventorying system. This form of administration—individual plans and processes at each district for the 150 repositories—is inefficient in caring for collections and does not provide the best curation value for the Corps, as efforts are duplicated at each district and processes are inconsistent.

Although vast strides have been made by the MCX CMAC in identifying and cataloguing our national collections, the current system provides neither intellectual nor physical control of the collections. The result is that access to materials for research, education, and public outreach is severely limited. The customer for these federal collections is the public—researchers, teachers, students, tribes, and the general public—and without knowledge and control of these collections, USACE is not professionally managing its collections to Federal standards across the Nation.

For example, the very manner in which our customers access information has changed significantly in the digital age, and storing the collections in a manner that will enable digitization and remote access must be a cornerstone of making these important educational resources available to the public. This requires USACE to gain physical and intellectual control over the entire collection universe, to properly rehabilitate collections, and to develop standardized processes and procedures for multi-format access.

This kind of efficient and modern management requires a centralized organization that has not only the responsibility for the collections, but the responsibility and professional staff to manage them. The MCX CMAC is recognized throughout the Federal government as having this capability.

1.2.3 Mississippi Valley Division Archaeological Collections

Nationally, the U.S. Army Corps of Engineers is divided into eight divisions, each comprising individual districts. The Mississippi Valley Division (MVD) is responsible for Corps programs within 370,000-square-miles of the Mississippi River Valley. The division boundary encompasses the entire Mississippi River from Lake Itasca, Minnesota, to the Gulf of Mexico. There are six districts within MVD—St. Paul, Rock Island, St. Louis, Memphis, Vicksburg, and New Orleans—and these districts include all or parts of 12 states: Arkansas, Illinois, Iowa, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, North Dakota, South Dakota, Tennessee, and Wisconsin.

The condition of archaeological collections within MVD is no different than the rest of USACE—ineffectively managed and improperly housed due to their dispersed locations and non-standard administration. While individual districts in MVD have made strides in gaining control over their collections, the collections are not being managed in a consistent or efficient manner. The disparity between the mission capabilities of the MCX CMAC and the Center’s responsibility over Division collections was recognized by leadership within the Mississippi Valley Division.

1.3 Current Study

In February 2014, MVD command directed the MCX CMAC to review the location, extent, and condition of MVD collections and to prepare a plan for consolidation that would include for a program for cost-effective and efficient long-term curation (BG Peter A. DeLuca, 11 February 2013, CEMVD-PD-SP, Policy Letter Regarding Regionalization, Appendix 1). The direction was for MCX to look at models that best fit the entire Division. The plan we have researched and presented uses a regional enterprise model that consolidates MVD collections into regional centers, which not only will provide cost savings over the next 10 to 20 years, but will reduce duplication of effort by eliminating dozens of unnecessary curation plans and administrative systems. Consolidated collections will introduce a system of standardization of collections care currently not in place throughout the Division. In addition, it will provide the intellectual and physical control needed for MVD to make the collections accessible to the public through a variety of outreach and educational platforms.

2. MVD Curation Plan Study Design

The NHPA, ARPA, and their implementing regulations (including 36 CFR Part 79) state that the archaeological objects removed from federal lands remain the property of the U.S. government and that federal land managers are to ensure that these artifacts are preserved by suitable scientific or educational institutions that possess adequate curatorial capabilities. MCX CMAC was directed to prepare a plan outlining the process for regional consolidation applied to MVD. Any plan to address consolidation and the proper long-term curation of this material requires a review and understanding of three components which define curation—collections, repositories, and funding.

To create a plan that adequately captures and operationalizes the Corps responsibility for each component, a number of interconnected actions are required. These actions address different components, but taken together, result in the necessary information to prepare a consolidation plan. Figure 1 depicts the components and actions.

2.1 MVD Curation Plan Study Components

MCX CMAC reviewed the three components for MVD curation through a series of concurrent actions. Information was coalesced for each component, and the specific findings are found in Chapter 3. An analysis of the findings, along with recommendations, is found in Chapter 4, and Chapter 5 contains the Operational Plan.

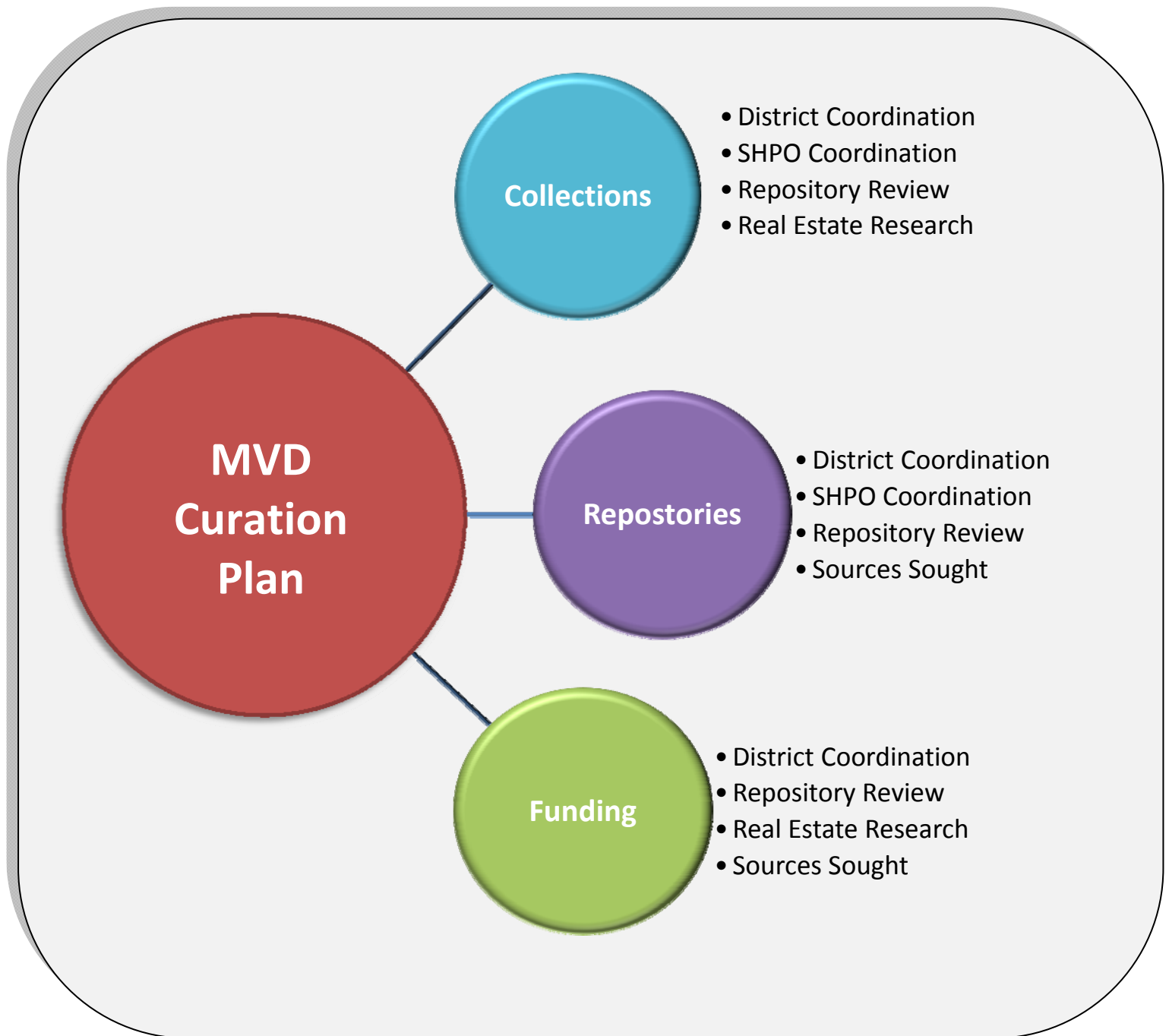
2.1.1 Component—Collections

To carry out the directive to prepare a consolidation plan, the first order of business was to update information on the location, content, and condition of MVD's collections. Every archeological project produces an archeological collection. An archaeological collection may result from work at a single site, from a single investigation or survey, or from a project that involves mitigation at a number of sites. An archaeological collection comprises not only the objects or artifacts collected during an excavation or survey, but also the non-cultural materials (e.g., ecofacts, soil samples, radiocarbon and other dating samples), associated records (e.g., field notes, maps, photographs, laboratory data), digital data (e.g., Global Positioning data, field and laboratory data recorded in a database, Computer Assisted Design (CAD) models), and research results or interpretation (e.g., site reports, letter reports, books, articles).

A key component to the collections is determining the level of responsibility for curation. The Corps must determine which collections were removed from their properties, resulting in Corps responsibility for the long-term care (ER 1130-2-540). Many Corps archaeological collections derive from lands owned by the Corps that were acquired in advance of the construction of large water resources projects (e.g., Carlyle Lake, Red Rock Lake), and long-term care for these is the responsibility of the Corps.

However, many of MVD's collections made in the last 30 years resulted from reconnaissance studies, feasibility studies, preconstruction engineering and design studies, and projects pursued under the Continuing Authority Program (CAP). For these types of projects, the collections are the property of the landowner. The Corps is not, therefore, responsible for the long-term curation of this material (Appendix C, ER 1105-2-100).

Figure 1. MVD Curation Study Components and Actions



2.1.2 Component—Repositories

MCX CMAC was directed to identify potential regional curation facilities by evaluating current and future available space and infrastructure, support facilities, qualified staff, outreach and educational capabilities, institutional support, and standardized process, all in accordance with 36 CFR Part 79.

A repository is “a facility such as a museum, archeological center, laboratory or storage facility that is managed by a university, college, museum, or other educational or scientific institution, a federal, state, or local government agency, or Indian tribe that can provide professional, systematic, and accountable curatorial services on a long-term basis” [§79.4(j)].

MCX CMAC has identified seven key criteria for an MVD regional repository.

(1) Compliance with 36 CFR Part 79. A repository must demonstrate compliance with the infrastructure, environmental, and staffing requirements of 36 CFR Part 79. Broadly, the repository must be physically and environmentally secure and have the professional staff that can accession, label, catalog, house, maintain, inventory, and preserve collections on a long-term basis using professional museum and archival practices.

(2) Adequate space. Space requirements include the square footage to house the current MVD collections, space to ensure collections are administered and preserved properly, and space for expansion as districts obtain new collections through their cultural resources mitigation activities.

(3) Broad collection acceptance policies. Repositories that serve MVD in a regional capacity must be able to accept and properly curate the following types of collections.

- Collections that contain Native American human remains and cultural objects subject to the Native American Graves Protection and Repatriation Act (NAGPRA). While NAGPRA provides a process for disposition to Indian tribes, not all materials have achieved disposition. Additional security and separate storage may be needed, along with the ability of staff to accommodate Indian tribes during the consultation process.
- Collections that originate from a different state of origin or outside their current mission.
- Collections that do not meet federal/repository standards at the time of transfer. Not all MVD collections presently meet federal standards. The expense of rehabilitating all MVD collections prior to consolidation is prohibitive and, therefore, repositories must accept collections that will be part of a phased rehabilitation effort once consolidation occurs.

(4) Contracting policies and abilities. Repositories must be able to compete for government contracts and have a mechanism by which to accept annual funding from one or more USACE source.

(5) Collection rehabilitation. A repository must demonstrate the ability to partner with USACE in a phased rehabilitation effort for collections.

(6) Database capabilities. A repository must demonstrate the ability to integrate collections into an electronic database, manage that database, and provide inventory information to MVD.

(7) Research support/outreach. A repository must demonstrate the ability to work with scientists, researchers, Indian tribes, and educators in a manner that allows USACE collections to be accessed by the wider community for research, education, or religious purposes. A repository must express the desire to work with the Corps to expand the remote access to collections for education purposes.

2.1.3 Component—Funding

MCX CMAC was directed to determine the status of existing curation contracts and agreements, to identify current mechanisms used for funding curation, and to outline funding and contracting alternatives for the most cost effective and efficient method of resourcing long term curation. MCX CMAC considered the curation fees, funding sources, and contract management/oversight as the key aspects in reviewing the most efficient plan for MVD consolidation.

There are two types of curation costs routinely recouped by repositories. The first is an in-processing or intake fee, which is associated with properly accessioning the collection into the repository, and includes tasks such as preparing inventories, entering data into repository databases, and initiating any necessary upgrades of the collection. The second cost is annual maintenance, which is used by the repository to maintain a stable environment, security, and up-to-date database for collections, routinely inspect collections, and provide annual curation information to the agency. Annual maintenance cost also provide the necessary funding to ensure that appropriate access is provided to the collections through repository assistance to educators, researchers, and Indian tribes.

2.2 MVD Curation Plan Study Actions

To adequately address each component of the curation plan, MCX CMAC conducted five concurrent actions (Figure 1). The information gathered from each action was coalesced to fully inform on each component. An analysis of the findings, along with recommendations, is found in Chapter 4, and Chapter 5 contains the Operational Plan.

2.2.1 Action—District Coordination

An important aspect of any large scale operation within USACE is the effective communication of goals, strategies, and risks to senior Corps leaders, combined with productive interaction between professional staff at all levels. First, district leadership must understand the goals and benefits of collection consolidation for both their district and for the division. Second, MCX CMAC could only achieve a full understanding of the risks and potential effects of the curation plan by understanding the views of leadership and professional staff. Finally, the project could only be completed with coordination and information sharing between MCX CMAC and district professional staff.

MCX CMAC briefed district senior leaders from all district offices (i.e., Command, Operations, Planning, Programs, Real Estate) to communicate the goals of the curation plan and to listen to concerns and perceived risks. MCX CMAC also communicated the need for leadership to support their professional staff in coordinating with MCX CMAC so that the full range of data could be generated. Funding for district staff was provided by MCX CMAC, and we worked closely with our district points of contact throughout the project. District coordination informed on all three curation plan components.

2.2.2 Action—SHPO Coordination

In addition to buy-in from MVD Districts, MCX CMAC had discussions with nearly all State Historic Preservation Offices and State Archaeologists for the states within MVD. State Historic Preservation Officers (SHPOs) administer the national historic preservation programs at the State level, review

National Register of Historic Places nominations, maintain data on historic properties within the state, and consult with Federal agencies during compliance reviews. The State Archaeologist is the individual responsible for protecting the history and prehistory of that state as preserved and recovered through the archaeological record. Information gathered during SHPO/State Archaeologist coordination was coalesced and will provide direction and insight during implementation. SHPO/State Archaeologist coordination informed on both the collections and repositories.

2.2.3 Action—Repository Review

MCX CMAC's repository review included a complete accounting of the repositories housing MVD collections. Working with district staff, MCX CMAC compiled a list of repositories that likely had MVD collections. MCX CMAC or district staff then contacted them to determine (1) if they had Corps collections, (2) the approximate volume of the collections, and (3) if they had the desire and ability to serve as an MVD regional center.

The standardized repository assessment used by MCX CMAC has proved effective during the last 20 years of research and field use. MCX CMAC conducted on-site visits to those repositories that had more than 20 cubic feet of MVD collections and/or those repositories that could potentially serve as an MVD regional center. For those repositories not visited, MCX CMAC gathered necessary information via telephone and electronic mail. The repository review informed on all study components.

2.2.4 Action—Real Estate Research

Generally, Corps responsibility for long-term curation rests on whether or not a collection originates from fee-title property. Within MVD, land ownership has not previously been considered as a factor in long-term curation responsibility. Simply, many repositories and district archaeologists assumed Corps responsibility for any collection in which Corps funds were used—either in whole or in part—during the investigation that produced the collection.

As stated previously, long-term curation responsibility does not extend to collections made during reconnaissance studies, feasibility studies, preconstruction engineering and design studies, and projects pursued under the Continuing Authority Program (CAP). For these types of projects, in which the Corps has no real property interest, the collections are the property of the landowner. Unless the Corps is the landowner, the district is not responsible for the long-term curation of this material (Appendix C, ER 1105-2-100). Real estate information informed on land ownership and provided information for both the collection and funding component. The information was gathered from district archaeologists, who, to various extents, coordinated with their real estate office. Additionally, information was gathered through a review of project and site documentation.

2.2.5 Action—Sources Sought

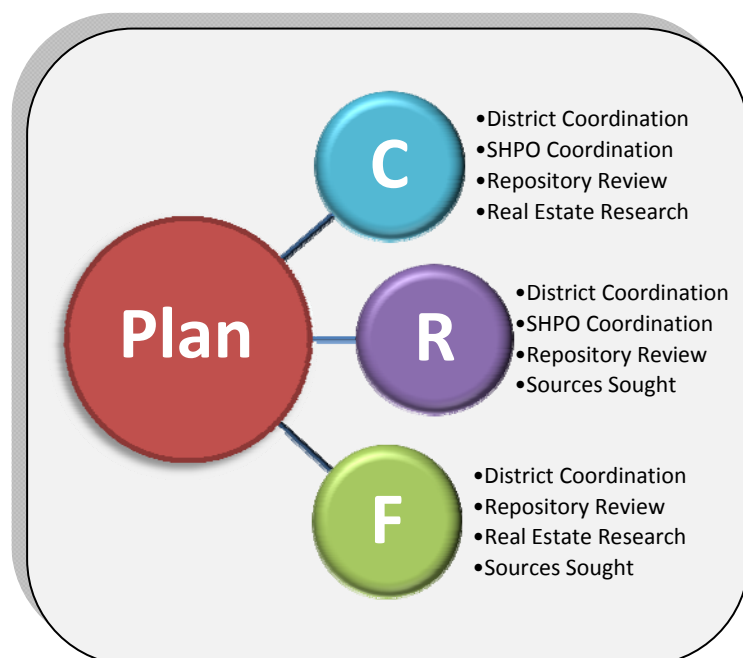
On the advice of Division staff, St. Louis District's contracting office issued a Sources Sought that invited interested parties to submit capability statements to address all capabilities required for an MVD regional curation center. A copy of the Sources Sought is contained in Appendix 2. The responses provided information that elaborated on the repositories and funding components.

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3. MVD Curation Plan Study Findings

The findings are organized by study component. All the information gathered through the numerous actions are coalesced to address each component—collections, repositories, and funding. A summary is provided initially for each component, followed by specific component information. Original data and information gathered is maintained at MCX CMAC and is available for review.

3.1 MVD Curation Study Findings—Collections



SUMMARY: A total of 48 repositories were reported to hold collections from MVD districts with a volume of approximately 7,359 cubic feet. ***After initial real estate and collection review, MCX CMAC has identified 22 repositories housing approximately 4,200 cubic feet, reducing the overall volume of collections by 43%.*** Real estate review is ongoing and refinements in the collection volume will continue. Additionally, at least 100 cubic feet of bulk collections require processing, and once complete, total volume will be further reduced.

The collection findings are organized by MVD district from north to south. More specific findings are included after the district-by-district review.

Initial collection and repository information was gathered from three sources. First, MCX CMAC had gathered data in 1998/1999 and reported them in 2000 in a large Corps-wide study (Corps Curation Assessment Project 2000). Second, a data call to all districts in 2007 updated that information. The initial list of repositories and volumes in 2014 consisted of the combined 2000 and 2007 data, plus any additional information gathered since that time up to study initiation. Third, as part of this effort, all districts were asked for a list of their repositories and the volumes, if known. MCX CMAC and/or district staff then contacted the repositories in 2014 to request information on the Corps collections—what volume of collections each center recorded as Corps responsibility. We also requested project names, site lists, project reports, and any additional information that may have assisted us in determining if the collections were Corps owned.

In the past it was sometimes assumed by one or all of the following—district archaeologist, contractor, and repository staff—that if the Corps sponsored (paid for) recovery, processing, and intake fees that the collections were “Corps collections” that the district would and should maintain forever. The collections were then listed by the repository as Corps, a distinction that remained from that point forward. Previous work by MCX CMAC (2000 and 2007) did not research Corps responsibility, but rather relied on the district and repository to define the collections.

In 2014, MCX CMAC specifically asked district archaeologists and repository staff about the origin of the collections and the land status of sites. Some districts had already begun researching the land-ownership of their collections and MCX CMAC used that data, while other districts maintained operating project databases that contained this information. In the absence of data from the district, the type of project and site locations were often indicative of non-Corps ownership (e.g., a feasibility study on land that was unlikely to have been owned by the Corps) or the project report clarified that land was not owned by the Corps. Depending on the level of district support and availability for this project, site ownership information was verified by the district, it was inferred by MCX CMAC based on project information, or a combination of both was used. In 2015, MCX CMAC is working with districts to continue to refine the list of collections for which the Corps has long-term curation responsibility and those for which we do not.

3.1.1 St. Paul District

Table 1 summarizes the data for the St. Paul District. Initially, 16 possible repositories were described to MCX CMAC as housing approximately 225 cubic feet of artifacts under control of St. Paul District. Through our telephone surveys, five repositories were determined not to have any USACE collections and 11 were identified for further review. Site visits were conducted at four repositories. Initial review of sites by the district archaeologist has determined that the St. Paul District is responsible for 97 cubic feet of artifacts stored at 11 repositories; per St. Paul District, further real estate research may be required.

The exact amount of records was difficult to determine as the specific St. Paul District records collections at the Wisconsin Historical Society could not be ascertained. WHS staff indicated that a complete review of their records would be required in order to identify all documentation for St. Paul District. The more thorough research into collection (site) ownership and total volume for MVP collections has reduced the volume by 57%. Although listed in the table below, USACE, St. Louis District's archaeological laboratory is not permanent curation facility; the collections at St. Louis District are being rehabilitated and will be returned to an appropriate long-term facility.

Table 1. St. Paul District Collection Summary

Repository	Current Volume (ft³)
<i>Minnesota Historical Society</i>	<i>3.5</i>
Mankato State University, Minnesota	1.3
Science Museum of Minnesota, St. Paul	2.5
<i>South Dakota Archaeological Research Center</i>	<i>1</i>
State Historical Society of North Dakota, Bismarck	10
University of Minnesota, Duluth, Superior National Forest Repository	1.5
University of South Dakota, Vermillion	4.2
<i>University of Wisconsin, Madison</i>	<i>4</i>
University of Wisconsin, Mississippi Valley Archaeological Center, LaCrosse	18
USACE, St. Louis District Archaeological Laboratory	16
<i>Wisconsin Division of Historic Preservation, State Historical Museum, Madison</i>	<i>35</i>
TOTAL	97

Note: bold italics indicate the repositories that were visited by MCX CMAC

3.1.2 Rock Island District

Table 2 summarizes the data for Rock Island District. Initially, six possible repositories were described to MCX CMAC as curating approximately 928 cubic feet of artifact materials and about 1,000 cubic feet of bulk collections under control of Rock Island District. Through discussion with the district, three repositories were determined not to have any USACE collections. Site visits were conducted at three locations. Real estate review is ongoing, and based on the information gathered to date, it has been determined that the Rock Island District is responsible for approximately 786 cubic feet of artifacts and 100 cubic feet of bulk collections. A small portion of the collection at Iowa State University, 25 cubic feet, requires complete processing and rehabilitation prior to transfer, and the processing of the bulk collections (slag glass and historic kiln refuse) is also needed. Finally, collection ownership at the Illinois State Museum for approximately 110 cubic feet is still under review, and it is possible this material is not the responsibility of the district. The more thorough search into collection (site) ownership and review of bulk collections has reduced the volume by at least 49%.

Table 2. Rock Island District Collection Summary

Repository	Current Volume (ft³)
<i>Illinois State Museum, Springfield</i>	240
<i>Iowa Office of the State Archaeologist, University of Iowa, Iowa City</i>	250
<i>Iowa State University, Ames</i>	296 and 100 bulk
TOTAL	886

Note: bold italics indicate the repositories that were visited by MCX CMAC

3.1.3 St. Louis District

As noted earlier, MVS identified the collections for which they were responsible, coalesced them, and initiated a plan to ensure they were properly housed and processed over 20 years ago. Currently, St. Louis District houses all of their archaeological materials at the Illinois State Museum (ISM). This material totals 2,468 cubic feet of artifacts and approximately 105 linear feet of records. The collections are inspected by MCX CMAC staff at least every two years.

3.1.4 Memphis District

Memphis District is not responsible for the long-term curation for any archaeological collections, as the District's archaeological work has been conducted on non-Corps property. During the archaeological projects, the District ensures that the collections are properly processed and placed into an appropriate facility, but the long-term care is not the responsibility of the District.

3.1.5 Vicksburg District

Table 3 summarizes the data for Vicksburg District. Initially, 17 possible repositories were described to MCX CMAC as curating approximately 2,000 cubic feet of artifact materials under control of Vicksburg District. Through research and telephone surveys, 10 repositories were determined not to have any USACE collections and seven were identified for further review. Site visits were conducted at five locations. Following real estate review, it has been determined that the Vicksburg District is responsible for approximately 570 cubic feet of artifacts. The amount of records was difficult to determine as Vicksburg District records at the AAS/UAM were not separated from other AAS/UAM records. AAS staff have indicated that delineating the Corps records would be most effectively done by AAS/UAM staff

through a complete review of their document collections. The research into collection (site) ownership has reduced the Vicksburg District's artifact collection volume by over 72%.

Table 3. Vicksburg District Collection Summary

Repository	Current Volume (ft ³)
<i>Arkansas Archaeological Survey, Magnolia Station, Magnolia</i>	29
<i>Arkansas Archaeological Survey/University of Arkansas Museum, Fayetteville</i>	114
<i>Louisiana Division of Archaeology, Baton Rouge</i>	79
<i>Mississippi Department of Archives and History, Jackson</i>	6
<i>Mississippi State University, Cobb Laboratory, Starkville</i>	298
Panamerican Consultants, Memphis, Tennessee	41
University of Louisiana, Monroe	3
TOTAL	570

Note: bold italics indicate the repositories that were visited by MCX CMAC

3.1.6 New Orleans District

Table 4 summarizes the data for New Orleans District. Initially, nine repositories were described to MCX CMAC as possibly curating approximately 736 cubic feet of artifact materials under the control of New Orleans District. Through telephone surveys, seven repositories were determined not to have any USACE collections and two were identified for further review. A site visit was conducted at one facility and collection status was confirmed by telephone for the other repository. Real estate research is on-going for New Orleans District. The maximum volume of New Orleans District's collections is 179 cubic feet, but MCX CMAC can only confirm that New Orleans District is responsible for 13 cubic feet of collections; the additional 166 cubic feet are being reviewed. As with other MVD districts, the extent of New Orleans records was difficult to determine, but it is likely that no more than 5 linear feet of documents represent the total for New Orleans District. The preliminary research into collection (site) ownership and total volume has reduced the volume by at least 75%, and additional research will likely further reduce the volume of New Orleans District collections.

Table 4. New Orleans District Collection Summary

Repository	Current Volume (ft ³)*
Goodwin and Associates, New Orleans	31
<i>Louisiana Division of Archaeology, Baton Rouge</i>	148
TOTAL	179

Note: bold italics indicate the repositories that were visited by MCX CMAC

* Total prior to completion of real estate research.

3.1.7 Specific Collections Findings and Recommendations

(1) The extent of MVD records is difficult to determine. Many repositories integrate records into their system either by accession number, site number, or record type. Because many of the records are not organized by agency, MCX CMAC was not able to effectively delineate the full range of Corps records. MCX CMAC recommends that this task be completed through a contract with each repository once the

specific site ownership research is complete; repository staff can review the totality of their document collections and collate Corps records efficiently.

As consolidation moves forward, districts or repositories may identify record collections that were not initially recorded as Corps. These materials can be transferred to the regional center at that time. All contracts will include language that requires the repository accept additional MVD collections as they are identified.

(2) Large bulk collection identified for only Rock Island District. There is a collection of large unprocessed material at Iowa State University, Ames, the majority of which is kiln refuse. The repository estimates this material to be 1,000 cubic feet, but MCX CMAC's visit indicates this material totals closer to 400 or 500 cubic feet, and that only 100 cubic feet is likely Corps owned. However, the condition and storage of this material make it impossible to specifically delineate Corps vs. non-Corps collections and processing of the entire volume will likely be required. MCX CMAC recommends processing this bulk material prior to any consolidation to reduce the volume and to delineate exactly which materials are Corps owned.

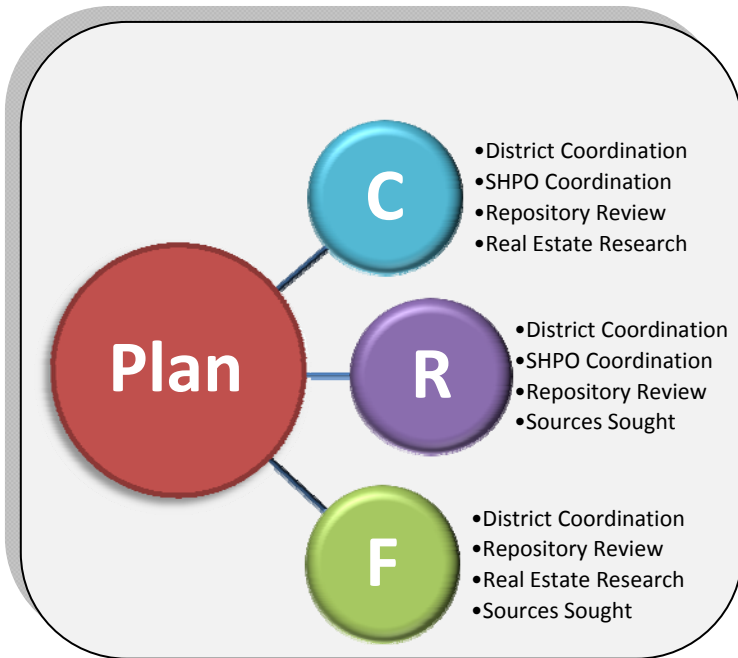
(3) Most collections need some level of rehabilitation. Many MVD collections have been upgraded since MCX CMAC's original review nearly 15 years ago, primarily through replacement of inadequate primary and secondary containers. Therefore, while most of the artifact and record collections are not in immediate danger, various upgrades are needed. The majority of the collections can be consolidated prior to any rehabilitation effort, with the exception of the bulk collections at Iowa State University, whose current storage condition will inhibit transfer.

(4) NAGPRA materials are found in collections for all districts except Memphis District. Five MVD districts have collections that require compliance under NAGPRA. The NAGPRA compliance process for this material is ongoing, and the majority of this material will see disposition under NAGPRA within the next five years. MCX CMAC did not delineate the exact volume of this material for this report, but information on the minimum number of individuals and the number of funerary objects is available from MCX CMAC.

(5) Research to determine Corps ownership and responsibility is not complete. MCX CMAC, with assistance from district personnel, has been able to determine the ownership status of many of the collections, particularly when the land on which the site is now located was never owned by the Corps. However, some sites are now located on land that is owned by the Corps, but the surveys and excavations that generated the collections may have been conducted prior to land acquisition.

The initial work for consolidation only requires determination of the type of real estate interest, if any, that the Corps had in the land when the collection was made. Was the land owned in fee by the Corps? If not, was there any other Corps property interest (e.g., permanent easement)? The second step, if there was no real property interest, is to determine who was the landowner at the time of recovery (other federal, state, local government or private individual/group). See Section 5.2.4 and 5.2.5 on current work with districts, Real Estate, and Office of Counsel to further delineate necessary requirements.

3.2 MVD Curation Study Findings—Repositories



SUMMARY: Initially, 48 repositories were reported to hold collections from MVD Districts. ***Review determined that 22 repositories house MVD collections. Sixteen of the repositories (73%) house less than 50 cubic feet each, and 13 (59%) house less than 30 cubic feet.***

There are eight facilities that have the desire to serve as an MVD curation center. The Sources Sought resulted in replies from five of these and for the remaining three, discussion with leadership at these facilities and reviews of their current facilities and collections highlight their potential. One potential repository does not currently house MVD archaeological collections. Three repositories meet all seven criteria outlined by MCX CMAC.

3.2.1 MVD Repository Findings

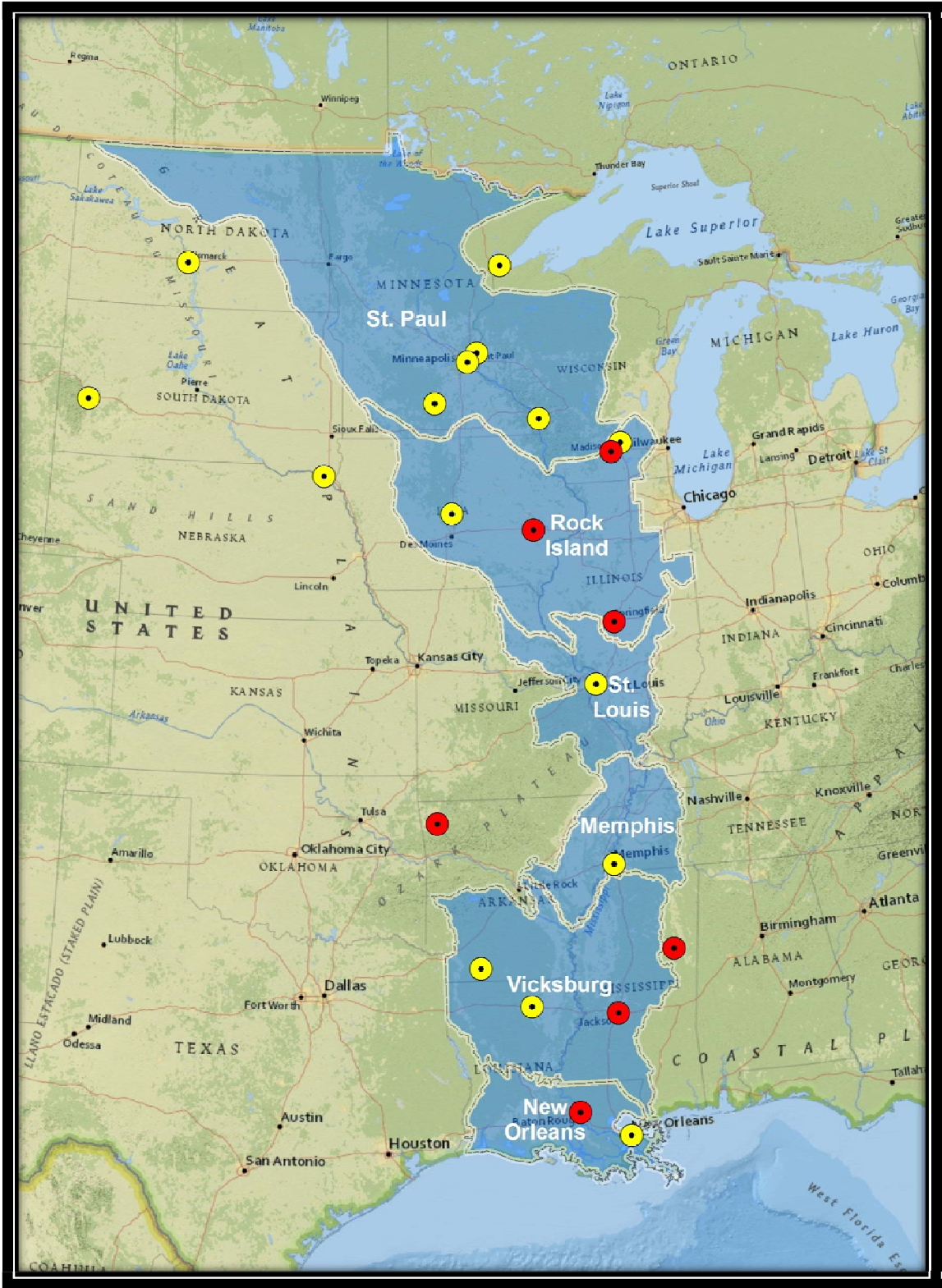
Working with district personnel, MCX CMAC initially identified 48 repositories that may house MVD collections. Discussions with repository personal narrowed the facilities to 22, of which 12 were visited. These repositories were visited due to their large volume of MVD collections, their interest in serving as a regional center, their role as the SHPO or State Archaeologists office, or a combination of these.

Figure 2 illustrates the location of MVD repositories. A yellow marker in the figure is a repository that has MVD collections, but does not have the potential to serve as a regional center; red markers indicate a repository that has MVD collections and has the potential to serves as a regional center. Table 5 lists all repositories and comments on the reason a repository was considered as a potential center or not.

Discussion with the SHPOs, State Archaeologists, and repository personal recognized the need to consolidate collections within fewer repositories. Over half of the repositories house less than 30 cubic feet of materials and nearly three-fourths have less than 50 cubic feet. Managing such small volume of collections at these locations is not deemed viable.

Repository staff at some facilities (e.g., Louisiana Division of Archaeology) expressed concern about the Corps' not being responsible for collections from land not owned by the Corps. Language in the regulations is clear, however, and the Corps must work with all repositories to delineate responsibility appropriately.

Figure 2. MVD Current Repositories



Note: Yellow indicates repositories that house MVD collections, but do not have the capability or desire to serve as a regional center. Red indicates repositories that have MVD collections and have the desire to serve as an MVD regional center.

Table 5. Repositories Housing MVD Collections

Repository	MVD Volume	Potential Center	Comment
Arkansas Archaeological Survey, Magnolia Station	29	No	Site visit by MCX CMAC. Lack of staff and appropriate facilities.
Arkansas Archaeological Survey/University of Arkansas Museum, Fayetteville	114	Yes	Site visit by MCX CMAC.
Goodwin and Associates, New Orleans	32	No	Contracting office; lack of staff and appropriate facilities.
Illinois State Museum	2,708	Yes	Site visit by MCX CMAC.
Iowa State University, Ames	396	No	Site visit by MCX CMAC. Lack of staff and appropriate facilities.
Louisiana Division of Archaeology, Baton Rouge	227	Yes	Site visit by MCX CMAC.
Mankato State University, Minnesota	1.3	No	Lack of staff and appropriate facilities.
Minnesota Historical Society	3.5	No	Not interested in such a mission.
Mississippi Department of Archives and History, Jackson	6	Yes	Site visit by MCX CMAC.
Mississippi State University, Cobb Laboratory, Starkville	298	Yes	Site visit by MCX CMAC.
Office of the State Archaeologist, Iowa	250	Yes	Site visit by MCX CMAC
Panamerican Consultants, Memphis, Tennessee	41	No	Contracting office; lack of staff and appropriate facilities.
Science Museum of Minnesota, St. Paul	2.5	No	Lack of staff and appropriate facilities.
South Dakota Archaeological Research Center	1	No	Not geographically viable for MVD.
State Historical Society of North Dakota, Bismarck	10	No	Not geographically viable for MVD. Generally do not accept out of state collections.
University of Louisiana, Monroe	3	No	Lack of staff and appropriate facilities.
University of Minnesota, Duluth, Superior National Forest Repository	1.5	No	Lack of staff and appropriate facilities.
University of South Dakota, Vermillion	4.2	No	Lack of staff and appropriate facilities.
University of Wisconsin, Madison	4	Yes	Site visit by MCX CMAC.
University of Wisconsin, Mississippi Valley Archaeological Center, LaCrosse	18	No	Did not express interest.
USACE, St. Louis District	16	No	Not a permanent repository.
Wisconsin Division of Historic Preservation, State Historical Museum, Madison	35	No	Not interested in such a mission.
22 Repositories	4,200		

3.2.2 Repositories with Potential to Serve as MVD Curation Centers

There are eight possible MVD curation centers. One center currently does not house MVD archaeological collections. These eight were determined based on discussions during on-site visits, data provided on repository evaluation forms, and responses to the Sources Sought. All eight have expressed a willingness and desire to serve as an MVD curation center. Table 6 compares these facilities based on the seven required capabilities detailed in Chapter 2, which are also summarized below.

- (1) Compliance with 36 CFR Part 79.
- (2) Adequate space to house at least 2,000 cubic feet and 400 linear feet.
- (3) Willingness to accept collections from all MVD states, that contain NAGPRA items, and that require upgrades.
- (4) Ability to compete for government contracts and to accept annual funding from USACE.
- (5) Ability to partner with USACE to complete a phased rehabilitation effort for collections.
- (6) Ability to integrate collections into an electronic database, manage that database, and provide inventory information to MVD.
- (7) Ability to work with scientists, researchers, Indian tribes, and educators for research, education, or religious purposes.

In some instances, a repository currently does not have a particular capability, but indicated that it would meet the criteria/obtain the capability were MVD to coalesce collections in the facility. In those cases, MCX CMAC did not check off the repository as having the capability in the table below, because it is not possible at this time to verify that the capability exists, or will exist.

- (1) Arkansas Archeological Survey/University of Arkansas Museum—AAS/UAM
- (2) Illinois State Museum—ISM
- (3) Jackson Group Archaeological Repository—JGAR
- (4) Mississippi Department of Archives and History—MDAH
- (5) Mississippi State University, Cobb Institute of Archaeology—Cobb
- (6) Office of Cultural Development, Louisiana Division of Archaeology—LDOA
- (7) Office of the State Archaeologist, Iowa—OSA
- (8) University of Wisconsin, Madison—UWM

Table 6. Comparison of Repository Capabilities

Requirement/Capability	AAS/UAM	ISM	JGAR	MDAH	Cobb	LDOA	OSA	UWM
36 CFR Part 79 Compliance	√	√		√	√	√	√	√
Adequate Space for MVD Collections		√	√	√				√
Broad Collection Acceptance Policies		√	√	√	√	√		√
Contracting Ability	√	√	√	√	√	√	√	√
Collection Rehabilitation Ability	√	√		√	√	√	√	√
Database Capabilities	√	√		√	√	√	√	√
Research Support and Outreach	√	√		√	√	√	√	√

3.2.3 Summary Information for Potential Regional Repositories

Detailed information for these eight repositories is found in Appendix 3, but a brief summary of MCX CMAC's review follows. MCX CMAC received Sources Sought responses from AAS/UAM, ISM, JGAR, OSA, and UWM. Three repositories, the Cobb Institute, LDOA, and MDAH did not respond to the sources sought, but answered detailed questionnaires on their current capabilities.

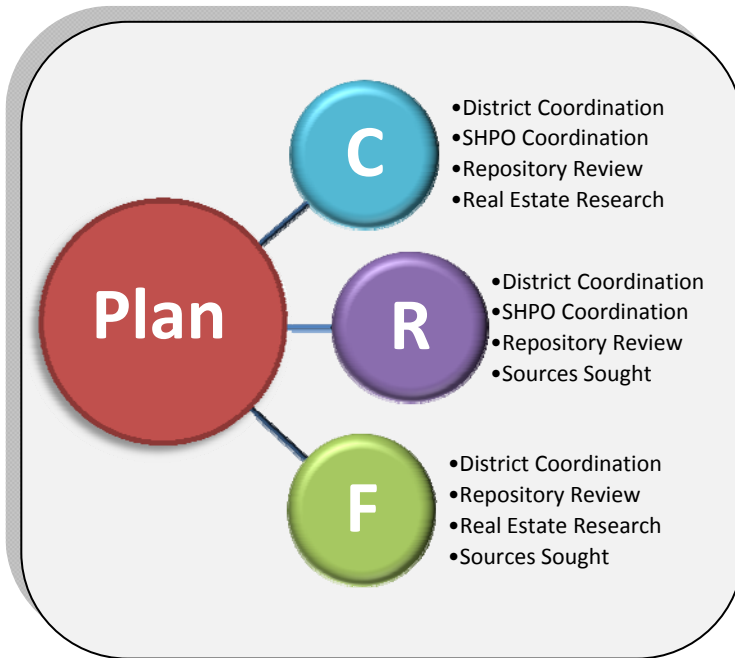
Except for JGAR, which currently does not house MVD collections, MCX CMAC conducted on-site reviews and assessments of these facilities. The on-site assessments included a physical inspection of the facility and collections, interviews with repository staff and leadership, as well as discussion with district and SHPO personnel about the repository, when possible.

All seven facilities that currently house MVD collections meet five of the seven necessary criteria to serve as an MVD regional center; the facilities (1) are up to 36 CFR Part 79, (2) have the ability to contract with the Corps, (3) have capabilities to rehabilitate collections, (4) maintain electronic database systems, and (5) have robust outreach and educational programs. Only three facilities, however—ISM, MDAH, and UWM—presently meet the two other necessary criteria—adequate space and broad collection acceptance policies.

Four facilities—AAS/UAM, the Cobb Institute, LDAO, and OSA—do not have adequate space for the addition of MVD archaeological collections and have proposed building additions, space reorganization, and/or new buildings in order to meet that capability. Also, at AAS, permission from the University Board of Trustees is required to accept collections from outside the state, and at OSA, collections from Iowa, or relevant to Iowa history and prehistory, are prioritized for acceptance.

JGAR is a recently constructed facility by the Jackson Group, a professional environmental consulting firm, with the intent to serve as a federal curation repository on a fee-for-service basis. The facility does not currently house MVD collections and therefore MCX CMAC could not assess their procedures and processes as compliant with 36 CFR Part 79. The database and rehabilitation capabilities are also untested. Additionally, as a private firm, the Jackson Group lacks the inherent educational and outreach mission of those repositories associated with a museum, university, or state educational system.

3.3 MVD Curation Study Findings—Funding



SUMMARY: *Contractual arrangements providing for one-time, lump sum payments for long-term collections maintenance are prohibited by 31 U.S.C .3324 because costs are incurred on an annual basis. Of the 22 repositories with collections, agreements are in place for only eight (36%), and these are not consistent in language, terms, or costs.*

The eight repositories that have the desire to serve as an MVD regional center have fee structures, but actual costs are to be determined through contract solicitation and negotiation.

3.3.1 District Contracts, Agreements, and Costs

Annual maintenance for collections is required for collections owned by the Corps. Because these costs are incurred by the repository on an annual basis, the Corps cannot provide one-time payments for services that have yet to be rendered. Any agreements that provide for one-time, lump sum payments for long-term collections management is an advance payment and is prohibited by 31 U.S.C . 3324. Therefore, the appropriate vehicle for the long-term maintenance of collections is an annual contract.

While all districts have at least one agreement in place with some of their repositories, only eight repositories operate under curation agreements. These agreements are not consistent in language, terms, or costs (Table 7).

St. Paul District has agreements with three facilities, one of which includes annual maintenance. Rock Island District has an agreement, but does not pay annual maintenance. The St. Louis District operates under a curation contract that is funded through the annual O&M budget process for all collections. Vicksburg and New Orleans Districts have agreements and pay annual maintenance costs for a portion of their collections, but this includes collections which this study has determined are not their long-term responsibility. Rock Island and Memphis Districts have agreements for depositing collections originating from Corps contracted work, but not from Corps owned land.

3.3.2 Repository Cost Structure

Potential regional centers provided information on their cost structure (Table 8). These are just the repositories published fee structures, and actual costs and fees for an MVD curation center would be determined through the contracting process and negotiations with the repository. When an MVD district has a current agreement with a repository, the table reflects both the published fees and the current MVD costs.

Table 7. Summary of Current MVD District Curation Funding

District	Repository	Annual Fees	Comment	Source of Funding
St. Paul	Minnesota Historical Society	n/a	Currently in the process of establishing agreement.	None
	ND Historical Society	None	5 year MOU with no annual or initial fee.	None
	UWM	\$120	5 year MOA with a \$30/box annual charge.	Operations
Rock Island	OSA	None	MOU with one time deposit cost.	Project funds
Memphis	AAS/UAM	None	Agreement for one-time deposit fees; collections are not from Corps land and there are no annual costs.	Project funds
St. Louis	ISM	\$43,700	Curation contract (FY14 to FY18) that increases 5% each year. Annual costs in FY15 equates to approximately \$20/cubic foot.	O&M funds from operating projects
Vicksburg	AAS/UAM	None	Deposit cost of \$250/cubic foot & \$15/linear inch	None
	Cobb Institute	\$13,454.28	Annual costs that equates to \$25.29/cubic foot with a blanket purchase order agreement for FY15.	Civil Works projects & O&M funding
	LDOA	\$21,042.50	Annual cost of \$50/cubic foot with a blanket purchase order agreement from October 2014 to September 2015.	Civil Works projects & O&M funding
New Orleans	LDOA	\$22,770.00	\$50/cubic foot under a cooperative agreement. FY13 fee paid in FY15.	Project funds

Table 8. Summary of Repository Fees

Repository	Fee Structure/Comment
AAS/UAM	One-time fee for the review and accessioning of each collection at \$250/cubic foot of artifacts and \$15/linear inch of records. Information on annual fees not available.
ISM	One-time curation fee of \$250/box (0.94 cubic feet) for both artifacts and records. Annual maintenance costs are determined based on the services required that year. The FY15 cost for St. Louis District's collection at ISM equates to approximately \$18/box or ~\$20/cubic foot.
JGAR	Federal agencies will be charged an intake fee (for data entry and conservation assessment), an annual maintenance fee per each standard box (1.2 cubic foot), and an inventory fee (every five years). For the exact total, JGAR's Sources Sought indicated that a quote for curation would be provided prior to deposit.
MDAH	Initial fee of \$250/cubic foot and an additional \$50/box for re-boxing into MDAH curation boxes if the collections must be upgraded.
Cobb	Information on initial fees is not available, although their procedures state that collections that are not in proper condition are either refused for curation at that time or properly processed at the repository for a fee. The annual fee paid by Vicksburg district equates to ~\$26/cubic foot.
LDOA	One time deposit fee of \$200/cubic foot; an annual maintenance fee of \$50/cubic foot.
OSA	One time acceptance fee of \$135/cubic foot and a \$10 per site accession fee; One-time acceptance fee of \$45 per linear inch and a \$5 per accession. Fees vary on oversized materials. For artifacts and documents not submitted in curation ready form, the charge is \$36 per hour. OSA did not provide information on annual maintenance costs, but rather staff indicated that maintenance of collections is assured by returns on endowment funds in control of the University of Iowa. Published information provides the annual fees at \$38/cubic foot and \$13/linear inch.
UW-Madison	One-time accessioning/in perpetuity processing fee is \$1000/cubic foot of artifacts and \$300/linear inch of documents. Annual fee for St. Paul District is \$30/box. These fees, along with annual maintenance fees, are negotiable for curation of federal collections.

4. MVD Curation Study Analysis

MVD collections are currently located at 22 repositories throughout the division, the majority of which have less than 30 cubic feet each. ***During all discussions with MVD leadership and professional staff, SHPOs/State Archaeologists, and repository staff, the need for better management and consolidation was understood and welcomed. The current plan, therefore, is not addressing whether or not consolidation is viable, but what consolidation should look like.***

To achieve the highest economy of scale and still address the needs of the collections, including educational/research access to the collections, MCX CMAC considered the number and location of consolidation centers, the administrative strategy, and the funding strategy that would best serve MVD for consolidation. Cost estimates for the MVD curation plan are included (details in Chapter 5), along with recommended sources for such funding. Actual costs will be determined through the contract solicitation process.

4.1 Number and Location of Consolidation Centers

Fewer facilities achieve the greatest economy of scale because there are—

- fewer contracts and less administrative management,
- fewer routine repository inspections,
- consistent database systems,
- well defined access procedures and protocols, and
- standardized housing and rehabilitation protocols and procedures.

There is no question that it is more cost effective and time efficient to have fewer facilities to manage. More importantly, gaining intellectual control over the collections—which is the only way the Corps can make these collections available to the greater public—is greatly enhanced by having fewer physical locations with fewer database and storage differences. Users of the collections will have a “one stop shop” at a repository, and will not have to coordinate with multiple repositories, administrative procedures, database systems, or loans.

Additionally, any regional repository will be required to meet the standards set forth in 36 CFR Part 79 that safeguard collections from damage and deterioration due to improper storage, improper environmental control, or lack of disaster policy and procedures. The current risks to the collections due to these factors will be reduced through consolidation.

At first glance, therefore, a single repository may seem to be the best choice. There would be one place, one system, and one administration. While this may be the most cost effective and time efficient, it may not necessarily provide the most viable option, the best collection management environment, or best customer outcome.

- While consolidation for better management is seen as necessary by Corps districts, most of the individuals interviewed consistently voiced a preference that collections remain in an area that is not greatly removed from their site of origin. Having the collections within a relatively close geographic area to the district is more politically viable than having a single repository with all

MVD collections that would, in some instances, be eight hundred or one thousand miles away from their origin.

- Archaeological collections are regional and their origin impacts their long-term curation and interpretational needs. The broad cultural regions used by archaeologists to organize the prehistory and history of North America are based on geographical/environmental zones as well as on cultural similarities and differences. These regions are usually further subdivided into sub-areas that broadly correspond to the distribution of one or more cultural traits, such as artifact typologies, settlement organization, or assemblage of tools.

To best manage and care for archaeological collections, a knowledge of the region—and that region's artifact type, preservation, and conservation—is required. Simply, collections from the upper Midwest differ significantly in type, style, and preservation from those collected in the coastal regions of Louisiana. Their storage needs vary and their interpretation requires repository staff to have regional archaeological, historical, and cultural knowledge.

MVD spans the entire north south extent of the United States and encompasses many different geographic and cultural regions. A single repository would be hard pressed to have the staff to effectively manage and interpret collections from such a large area that encompasses many cultural regions and traditions. While it would be possible to require a single regional center to hire regional experts, it is certainly not the most effective use of resources.

- Third, regional access to collections is important. Educators at the primary and secondary levels look locally for resources, and being able to access materials within their region is invaluable. Repositories within specific regions have the networks and programs for education and research already established. Tapping into these resources is essential for MVD collections use.

Much like the Corps is an organization based on watersheds, organizing MVD repositories to take into account geographic and cultural regions is the best model for adequately addressing the needs of the collections and the users. Cost savings can be maximized by choosing the fewest number of cultural/geographical areas and establishing repositories within these areas. Additionally, MVD's archaeological collections are a part of the entirety of the Corps archaeological collection universe, and MCX CMAC does not view MVD collections in isolation. Rather, regional centers established for MVD collections will be available to serve nearby districts (from other divisions) in a manner that will further enhance the overall Corps goal of achieving efficiencies in practices and processes.

MCX CMAC recommends that MVD's consolidation plan house collections into the fewest number of repositories that could adequately represent the cultural and geographic regions of MVD. Three repositories are proposed—a northern, a central, and a southern facility (Figure 3). The figure does not identify a specific repository in each region, but rather is a schematic illustration of the regional concept. The specific repositories will be chosen through the contract solicitation process.

MCX CMAC is recommending a model for the division as a whole, and some collection will be moved out of their state of origin. However, nothing in the regional center model inhibits researchers from accessing and using collections. Gaining full intellectual and physical control of the collections by coalescing them into the regional centers will facilitate loans of collections to researchers, educators, and repositories. In addition, digitization of resources, part of the long-term plan for regional centers, will make collections widely available to individuals throughout the country.

**Figure 3. Schematic of MVD Regional Repositories
(geographic median in each region)**



4.2 Administrative Strategy for MVD Collections

4.2.1 Current Administrations within MVD

An administrative strategy focuses on the overall operations and management of the curation program within MVD. Each district currently manages their long-term curation efforts individually. Most district cultural resources staff are professional archaeologists, not subject matter experts in archaeological curation and records management. The policies and procedures employed by districts for collections care vary, with no consistency in funding, oversight, or standard inventory system. This form of administration—individual plans and processes at each district for the 22 repositories—is inefficient in caring for collections and does not provide the best curation value for the Corps, as efforts are duplicated at each district and processes are inconsistent.

The current system provides neither intellectual nor physical control of the collections. The result is that access to materials for research, education, and public outreach is severely limited. The customer for these federal collections is the public—researchers, teachers, students, tribes, and the general public—and without knowledge and control of these collections, USACE is not professionally managing its collections to serve its core customers and the Nation.

4.2.2 Attributes of Effective Administration

There are four key attributes to effective collection management that should be considered when adopting a management strategy for archaeological collections. These attributes are listed below, and Table 9 compares the current system of MVD collection administration to one in which the MCX CMAC manages the materials.

(1) Centralized Financial Management. An efficient program centralizes funding processes and procedures. This allows financial resources to be allocated based on MVD-wide curation goals and permits the assessment of the effectiveness of the allocated resources. Individual districts, however, must budget for annual maintenance costs and transfer funds to St. Louis District to meet contract obligations (see 4.3.4)

(2) Technical Proficiency. Administration of the collections for MVD includes, but is not limited to, ensuring proper terms and conditions are included in contracts and agreements for curatorial services (§79.8), overseeing and/or conducting periodic inspections and inventories (§79.11), and maintaining curation data (§79.5c). Curation and collections management should be a primary duty of the individual overseeing collections. Additionally, both cultural resources staff and contracting staff must have the technical proficiency to initiate, solicit, and maintain curation contracts.

(3) Standardized Protocols. For a robust collections management program, consistent and standardized protocols ensure that best-practices are distributed and followed at all levels. Standardized curation data parameters are necessary for the implementation of any collections management program.

(4) Centralized Data Management. The maintenance of MVD-wide centralized data for tracking and reporting ensures that data is not lost through attrition of personnel at any level. Additionally, the information, if gathered using standardized protocols, is available for establishing priorities, out-year planning, and a cost efficient MVD curation program.

Table 9. Curation Administrative Comparison

Attribute Standard	Individual District Administration	MCX CMAC Administration
<u>Centralized Financial Management</u> <ul style="list-style-type: none"> • <i>Established processes distributing funds.</i> • <i>Financial resources to be allocated based on MVD-wide curation goals.</i> • <i>Assessment of the effectiveness of the allocated resources.</i> • <i>Measurable annual progress toward collections rehabilitation.</i> 	<ul style="list-style-type: none"> • No established process for curation contracts. • 6 different ways of managing financial resources for curation. • Financial resources allocated based on district priorities. • Annual progress towards collections rehabilitation impacted by district priorities. 	<ul style="list-style-type: none"> • Established processes for curation contracting. • Financial resources allocated based on MVD curation goals. • Districts continue to budget for annual maintenance, with these funds a priority for meeting contract obligations. • Assessment of the effectiveness of the allocated resources is possible. • Annual progress toward collections rehabilitation can be made and measured.
<u>Technical Proficiency</u> <ul style="list-style-type: none"> • <i>Staff have technical proficiency in collections management.</i> • <i>Curation is not a collateral duty.</i> 	<ul style="list-style-type: none"> • District staff have varying levels of technical proficiency. • Budget constraints at District limit the number of cultural resources staff and curation training dollars. • Curation is a collateral duty with cultural resources staff. 	<ul style="list-style-type: none"> • Technical proficiency and knowledge of curation regulations and current best practice technologies is maintained as part of MCX CMAC mission. • Curation is the priority, not a collateral duty. • Knowledge base not lost through attrition of personnel. • MCX CMAC and St. Louis District's contracting offices have worked with curation services contracts for MVS collections for over 20 years, both CONES and CORONUS.
<u>Standardized protocols</u> <ul style="list-style-type: none"> • <i>Standardized protocols for best-practices are distributed and followed.</i> • <i>Standardized curation data parameters for measuring curation performance.</i> 	<ul style="list-style-type: none"> • No consistent administrative processes and protocols across districts. • Curation agreements, when present, are not standard. 	<ul style="list-style-type: none"> • MVD standardized protocols and processes (VCP). • Standardized curation parameters. • Metrics for collections management. • Standardized curation services contracts.
<u>Centralized data management</u> <ul style="list-style-type: none"> • <i>Maintain centralized data for tracking and reporting.</i> • <i>Data is not lost through attrition of personnel.</i> • <i>Meaningful data is available for establishing protocols, priorities, and out-year planning.</i> 	<ul style="list-style-type: none"> • Data maintained by 6 districts in various formats. • The level and quality of information maintained varies. • Upward reporting is a time consuming process. • Out-year planning on MVD-wide basis is difficult. 	<ul style="list-style-type: none"> • MVD-wide centralized data maintained. • Data is not lost through attrition of personnel. • Upward reporting is time efficient. • Meaningful data to effectively plan for out-year activities to achieve the highest levels of proper collections care and best use of resources.

In addition to the factors addressed in Table 9, the current and future workload and workforce must be considered. During the monthly teleconference of MVD regional specialist in November 2014, it was highlighted that MVD districts have lost, and will continue to lose—through retirement or job transfer—cultural resources specialists. The current fiscal climate may inhibit or hinder these positions being filled, increasing the workload on the current staff. District priorities for cultural resources personnel necessarily address emergent compliance needs so that district operations are maintained as seamlessly as possible to serve our customers. Duties for curation oversight further extends the workforce unnecessarily when MCX CMAC staff are available for these tasks.

An MCX CMAC administration and responsibility for MVD collections provides the best solution to administering the MVD regional centers, as the single source provides for all necessary attributes for managing a collection of artifacts and records. MCX CMAC has been in the business of curation for the last 20 years with staff dedicated to curation and collections needs full time, and the knowledge base within the Center will not be lost through attrition. Centrally managing MVD collections through the MCX CMAC provides the greatest benefit to the collections and the Corps districts.

4.3. Contracting and Funding for MVD Curation

4.3.1 Contracting Options

Promulgated under the authorities of the National Historic Preservation Act, the Reservoir Salvage Act, and the Archaeological Resources Protection Act, 36 CFR Part 79 includes the requirement to ensure that sufficient funds are available for adequate long-term care and maintenance of collections. Each curation center requires a curation contract because an agreement providing for a one-time, lump sum payment for long-term collections management is prohibited by 31 USC 3324. As outlined in the MCX CMAC ER (ER 1110-3-109) and the Corps' Cultural Resources ER (ER 1130-2-540), MVD has the option to acquire collections management services in four different ways.

- (1) Place the collection in a collections management center that is owned, leased, or otherwise operated by USACE.
- (2) Use a purchase order or enter into a contract with a collections management center that meets the standards of this guidance, including a state, regional, local, or Native American tribal repository; a university; a museum; or other scientific or educational institutions.
- (3) Enter into an interagency agreement with another Federal agency or intra-agency agreement with another USACE Command for collections management services.
- (4) Transfer collections to another Federal agency for management, in compliance with the requirements of 36 CFR Part 79.

The only viable option for the implementation of a regional center strategy is option two—enter into a contract with a collections management center that meets the standards of the Federal curation regulation. Option one is not viable because USACE does not operate collections management centers. Likewise, options three and four are not viable as the MCX CMAC has not identified another Federal agency or USACE command willing to curate MVD's collections through agreement or transfer.

Developing and administering curation contracts is one of the mandatory services outlined in the ER 1110-3-109. St. Louis District's contracting office and MCX CMAC technical staff have extensive knowledge and experience with contracts for archaeological curation services.

4.3.2 Contracting and Administrative Cost Estimates

Curation contracts can be established for a base year, plus up to four option years. Based on the contract award process for St. Louis District collections, the administrative costs for establishing a curation contract with a regional center would cost between \$20,000 and \$25,000 per contract solicitation in the base year. Once the contract is established and the collections are housed within a regional center, maintenance of the contract would cost approximately \$5,000 per year for cultural resources staff and contracting staff, which would total \$20,000 over the four options years. Therefore, every five years (base year + 4), the cost for administering a curation contract would be \$40,000 to \$45,000. District should also be directing resources toward quality assurance of contract services. Based on a GS11 to 12 salary, the annual contract QA cost would be approximately \$3,200 to \$4,000 per repository per year, or up to \$20,000 over the life of a five-year contract. Table 10 summarizes these costs.

Table 10. Cost Breakdown for Curation Contracts per Repository

Scenario	Repository Number	Contract Cost	QA Cost	Total
Base Year Solicitation	1	\$25,000	\$4,000	\$29,000
Scenario	Repository Number	Maintenance Cost	QA Cost	Total
+ 4 Option years	1	\$20,000	\$16,000	\$36,000
Total		\$45,000	\$20,000	\$65,000

In summary, an efficient curation and contracting program such as that at the MCX CMAC would require approximately \$65,000 every five years to manage and administer a curation contract for a repository. Of the 22 current repositories housing MVD collections, only 13 of these could reasonably be considered to be able contract with MVD districts for long-term curation (e.g., USACE, St. Louis District is not a permanent repository and currently has collections only during rehabilitation; the Science Museum of Minnesota does not curate archaeological collections).

If individual MVD districts contracted with these 13 facilities, MCX CMAC estimates the cost for contracting and collection administration would be nearly \$845,000 every five years (Table 11). Even reducing the number to one per state that has MVD collections (10) or one per district with collections (5), costs still exceed \$325,000.

If the contracting and administrative process were centralized within MCX CMAC, there would be a single solicitation proposal for a firm-fixed price contract for up to three regional centers within MVD. MCX CMAC would be able to solicit the contract for not more than \$45,000, and manage the contracts (up to three) for over the five-year period of performance at a cost of not more than \$20,000/5 years. Compared with the other scenarios in Table 11 this equates to a savings of from \$260,000 to up to \$780,000 savings every five years, or up to \$4,000,000 over the next 20 years.

Table 11. Costs of District Administration of Collections

Scenario	Repository Number	5 year Contract Cost*	QA Cost*	Total*
Current Facilities	13	\$585,000	\$260,000	\$845,000
One per state	10	\$450,000	\$200,000	\$650,000
One per district	5	\$225,000	\$100,000	\$325,000
MCX CMAC	3	\$45,000	\$20,000	\$65,000

*based on \$45,000 for contract and \$20,000 for admin costs

Additionally, if districts maintain administrative control over collections at 5, 10, or 13 repositories, MVD does not benefit from the single source administration identified above in Table 9. Simply reducing the number of repositories per district does not provide for the overall best care of the collections, nor does it garner the greatest efficiencies in management and cost savings to the government—reducing the number of districts managing such contracts and administering the collections is a critical component to efficiency.

4.3.3 Consolidation Costs

Consolidating collections into regional centers will involve a transfer cost, an initial in-processing cost, and costs incurred by repositories to assist in the consolidation and transfer (e.g., processing of bulk collections at Iowa State University; coalescing records at the Wisconsin Historical Society). Per 36 CFR Part 79, funds may be used to deposit a collection in a repository “that can provide curatorial services in accordance with the regulations.” (36 CFR §79.7(a)(6)(ii)). MCX CMAC has estimated these costs based on the operational plan presented in Chapter 5 using current published or charged fees to USACE (Appendix 4). To achieve consolidation within five years, MCX CMAC estimates the costs around \$1,500,000 (Table 12).

Table 12. Cost of Consolidation

Contract (base + 4 option years)	\$ 65,000
Repository Preparation	\$ 330,000
District Personnel	\$ 120,000
Transfer of Collections	\$ 69,100
In-processing	\$ 347,250
Annual Maintenance (year 3, 4 & 5)	\$ <u>270,621</u>
<i>Sub-Total</i>	\$1,299,971
<i>20% Contingency</i>	\$ <u>253,384</u>
Total	\$1,520,365

Districts would not be required to fund the contracting process if MCX CMAC were directed to solicit and manage the contracts. Additionally, nothing in the MCX CMAC ER or Corps’ cultural resources ER prohibit the MCX CMAC from requesting O&M funds for curation costs associated with consolidation. Therefore, costs for the repository and districts to prepare for consolidation, along with the transfer and in-processing can be covered through submitted annual O&M work plans/packages, over and above the budgeted MCX CMAC line-item (see 4.3.5). Therefore, the costs for collection preparation, transfer, and in-processing would not be borne by individual districts.

4.3.4 Annual Maintenance Costs

The annual maintenance costs will be determined and negotiated through the contracting process. These costs are to be budgeted at the individual district level (see section 4.3.5(3)), with the annual funds transferred to St. Louis district for contract obligation. MCX CMAC has estimated the average dollar amounts for this costs based on information provided by the repositories and districts. The average annual maintenance cost currently charged to MVD districts is \$31/cubic foot. For a total of 4,200 cubic feet within MVD, a cost of not more than \$131,000 can be expected for annual maintenance. This cost will be borne by each district based on the volume of collection each district maintains at that repository (see 4.3.5). For example, if St. Louis District maintained 2,000 cubic feet of collections at the central repository and Rock Island maintained 1,000 cubic feet, the cost (based on the average \$31/cubic foot) would be \$62,000 for St. Louis District and \$31,000 for Rock Island.

Table 13 breaks down the approximate cost (based on volume of collection reported in Chapter 3) per district. In addition to using the average for all collections, MCX CMAC estimated the annual costs for the repositories identified in the proposed operation plan (Chapter 5) based on the costs currently charged to MVD districts at these facilities. The total in this second scenario is no more than \$94,000 for all districts. In summary, annual maintenance costs will likely be between \$94,000 and \$131,000 with an increase of 3% to 5% each year.

Table 13. Estimated Annual Maintenance Cost

District	Volume	Average annual cost of \$31/cubic foot	Fee based operational plan repositories
St. Paul	97	\$3007	\$2910 (\$30/box)
Rock Island	886	\$27,466	\$17,720 (\$20/cubic foot)
St. Louis	2,468	\$76,508	\$49,360 (\$20/cubic foot)
Memphis	0	\$0	\$0
Vicksburg	570	\$17,670	\$17,670 (\$31/cubic foot)*
New Orleans	179	\$5,549	\$5,549 (\$31/cubic foot)*
TOTAL	4,200	\$130,200	\$93,209

*average is used

4.3.5 Funding Authority and Consolidation Budgeting

The authority for USACE to expend funds for curation is given by 36 CFR Part 79, which is promulgated under the authority given in 16 U.S. C. 4700aa-mm and 16 U.S.C. 470 et seq. The Corps distributes and uses these funds appropriately through the cultural resources programs at each district. The MCX CMAC was established in December 1994. The Center's mission was outlined in its initial mission and function statements, and ER 1110-3-109 lists the mandatory services provided to and for USACE Commands, and states that the center will:

Distribute funding to USACE Commands for archaeological curation tasks, with the exception of costs for annual collections maintenance. The funded curation tasks include, but are not limited to, the development of District-specific curation plans; collections rehabilitation and preparation of collections for long-term curation; periodic collections inventory; repository in-processing/accessioning fees; repository infrastructure improvements; repository equipment; and labor for curation contract development and finalization.

Funding for the MCX CMAC mission is provided annually through a remaining line-item in the O&M budget. The language in the ER dictates the path forward for the implementation of MVD's consolidation plan. The Center can fund certain aspects of curation using the annual line-item appropriation, including costs to assess collections and repositories, assist district in preparing curation contracts, and rehabilitating collections. Funding for annual maintenance of collections is currently not part of the MCX CMAC mission or funding; funding responsibility for this rests with the district. However, nothing prohibits MVD from requesting MCX CMAC to manage MVD collections in regional centers using funds distributed to the MCX CMAC via the annual budgeting process that includes monies from approved work packages (to consolidate collections) and funds transferred from districts to the MCX CMAC (for long-term maintenance). Therefore, funding for implementation of MVD's consolidation plan is recommended as follows.

(1) Contracting and Collection Administration. *MCX CMAC recommends that the Center be directed to solicit and administer regional curation center contracts. MCX CMAC's mission includes contract development and finalization for Corps districts.* If contracting tasks remain at the individual districts (MCX CMAC is not directed to administer contracts for regional consolidation), district funds would be required to establish, administer, and maintain each curation contract. If each district were to establish and maintain a single repository, the cost would be \$65,000 per district every five years. For the five districts with collections, this totals \$325,000, and this number would increase as the number of repositories per district increased. With MCX CMAC centralized management, MVD districts would not be required to secure funding for these tasks, but rather, MCX CMAC will complete the tasks.

(2) Consolidation. Funding to consolidate collections into regional centers—the costs for preparing collections, transferring collections, and in-processing—can appropriately be sought and disbursed by MCX CMAC, but would be in addition to the annual funding for the Center. MCX CMAC recommends that annual O&M work plans/packages, over and above the budgeted MCX CMAC line-item, be prepared and submitted by MCX CMAC over the next five years to achieve consolidation (see Chapter 5). Since these additional work plans/packages will be separate from the budgeted work plan/package there is a risk that these activities will not be funded. ***MVD CG direction to prioritize the consolidation work plans/packages is critical for regional consolidation to succeed.*** These costs are one-time costs for transfer of collections.

(3) Annual Maintenance. In-processing costs, paid as part of the consolidation process, would cover the first year of maintenance. Individual districts must provide for the annual recurring costs for curation contracts. Therefore, MVD Commands must prepare, or continue to prepare, annual work plans/budget packages at the relevant operational projects, and under the appropriate O&M business line, for the contractual costs for archaeological collections maintenance. Each district should budget the funds from the appropriate project or O&M business line, depending on the origin of the material. The annual costs will be determined through contract negotiations, but should range between \$94,000 and \$131,000 total for all five districts (Table 13). This fee would likely increase between 3% and 5% each year.

The secured funds would be transferred from the individual districts to MCX CMAC for administering these contracts. MCX CMAC recommends that each district pay the annual maintenance fees in proportion to the volume of collections they have at a facility and that budgets be prepared in advance accordingly. Because annual funding has not been consistent at most MVD districts, there is a risk that

not all of the funds for annual maintenance will be forthcoming. ***MVD CG direction to the Commands to prioritize these packages for annual contracts is critical for regional consolidation to succeed.***

In-processing costs, paid as part of the consolidation process, would cover the first year of maintenance. Upon MVD direction for consolidation to begin, districts can work with their Operations Divisions to identify the appropriate project and O&M business line to request adequate funding to cover anticipated annual fees. The consolidation process—establishing a contract, preparing collections, and physically transferring them—will take a minimum of 12 months. Districts, therefore, will have at least two years in the budgeting cycle before the first year of annual maintenance is required. However, districts should begin now to budget for curation contract costs in FY17.

4.3.6 Funding Source Summary

For the consolidation actions—establishing contracts, transferring collections, in-processing at the regional center—funding will be requested through the annual MCX CMAC O&M remaining line-item, with supporting work packages.

For annual maintenance, each district should budget the funds under the appropriate project's O&M business line, depending on the origin of the material. For example, if the collections were generated with flood risk management funds, then FRM funds should be requested for annual maintenance. If collections were generated with navigation funds, then NAV funds should be requested. At multipurpose projects, the primary business line would budget for the curation or in some cases, Joint Costs at multipurpose project with Hydropower. MVD Commands must prepare annual budget packages at the relevant operational projects and under the appropriate O&M business line for the contractual costs for archaeological collections maintenance. The annual budget engineer circular (EC) defines the increment levels across business lines for curation O&M under the Annex III for Operations and Maintenance.

4.3.7 Rehabilitation of Collections

Some level of rehabilitation is required for many MVD collections. Collections rehabilitation would continue through the MCX CMAC-managed Veterans Curation Program (VCP), and as necessary, through the regional curation centers. Under this proposal, the VCP, in tandem with the regional centers, will rehabilitate these national collections, ensuring their long-term preservation, while veterans will continue to be employed and trained. The VCP program model employs and trains veterans that are hired by contractors for short-term employment (5–6 months) and job skill training working with the archaeological collections. If continued at its current funding level, the MCX CMAC's program contractors will employ and train between 600 and 700 veterans over the next 10 years. Funding from the MCX CMAC's annual remaining O&M line item will be used for these rehabilitation efforts.

The initial plan for MVD collections includes both the current VCP stand-alone laboratories and smaller VCPs run at the regional repositories. One long term goal currently being explored is to have VCPs at regional centers as they open across the United States. Contractors may also be used for specific types of collections or to increase efficiency. If collections must be moved off site for processing (either by a standalone VCP or by a separate contractor because of the nature of the collection), costs for transport will be borne by MCX CMAC and not by the district. Contract language with regional repositories can ensure that a second in-processing fee is not required for return of a collection already in-processed at a center.

4.4 Contracting and Administrative Efficiencies

Table 14 outlines the contracting and administrative cost savings associated with consolidation and MCX CMAC management. The comparison illustrates costs associated with individual district managing collection at the 13 viable repositories that currently hold collections versus the costs associated with MCX CMAC management at three regional centers. In addition to the contract costs outlined above, districts should be appropriately managing the collection, which includes, but is not limited to, annual inspections, oversight of rehabilitation efforts, inventory/database management, and oversight on any loan or study of the material. A conservative estimate for an annual inventory at a single repository is \$2,000 (labor and travel considered). Add 80 hours of district staff to provide further management, at rate of an average GS-12 (\$100/hour). The 20-year savings if MCX CMAC were to complete these tasks at three repositories vs. districts at 13 repositories exceeds \$4M.

Table 14. Contract and Administrative Savings

Task over 5 year period	Individual Districts at 13 repositories	MCX CMAC at 3 centers	5 year savings	20 year savings
Contract Administration	\$845,000	\$65,000	\$780,000	\$3,120,000
Collection Inspections	\$130,000	\$30,000	\$100,000	\$400,000
Collection Management	\$200,000	\$40,000	\$160,000	\$640,000
TOTAL	\$1,210,000	127,500	1,015,000	\$4,160,000

There are many non-quantifiable benefits to the proposed consolidation, both administratively and for the collections, as outlined throughout this report. For example—

- Collections will be moved out of substandard facilities and are no longer at risk due to repositories closing their doors.
- The full potential of the collections can be realized more quickly and easily as technologies develop to make them available to the wider public.
- Annual progress toward rehabilitation can be made and measured.
- District archaeologists can focus on emergent and district compliance needs so that districts operations are maintained as seamlessly as possible.
- Curation data will be maintained long-term and data will not be lost through attrition of personnel.

5. Operational Plan for Consolidation

5.1 Operational Plan Years 1 to 5

The operational plan for MVD collections consolidation requires that MVD request MCX CMAC to consolidate MVD collections and administer them long-term. Additionally, the plan is based on the implementation of the following recommendations.

- Three regional centers are determined appropriate for MVD.
- Bulk collections are processed prior to consolidation. Annual O&M work plans/packages, over and above the budgeted MCX CMAC line-item, will be prepared and submitted by MCX CMAC to fund this work (submitted by MCX CMAC for FY15).
- Records are coalesced by repositories. Annual O&M work plans/packages, over and above the budgeted MCX CMAC line-item, will be prepared and submitted by MCX CMAC to fund consolidation (submitted by MCX CMAC for FY15).
- A firm-fixed-price contract is solicited and managed through the St. Louis District for each repository. Funding for the contract solicitation and administration would be through the MCX CMAC annual line item.
- Districts budget for and provide annual curation contract maintenance funds to MCX CMAC, based on the proportion of collections they have at each facility. District leadership must prioritize funding curation contract obligations.
- MCX CMAC provides administrative oversight for MVD curation. Funding for the administration would be through the MCX CMAC's annual remaining O&M line item.
- Phased collection rehabilitation takes place through repositories and the VCP. Funding from the MCX CMAC's annual remaining O&M line item will be used for the VCP rehabilitation efforts.

For budget estimations, MCX CMAC chose to use the repository in each region that met all capabilities as outlined in Chapter 3—University of Wisconsin, Madison (UWM) in the northern region; Illinois State Museum (ISM) in the central region; and the Mississippi Department of Archives and History (MDAH) in the southern region. Table 15 summarizes the first five years of MVD consolidation. Appendix 4 contains the cost breakdowns. For these estimates, MCX CMAC used the current costs incurred by MVD districts and/or published fees from the specific repository, whichever was available.

Once collections are within the regional center, annual costs and a phased rehabilitation program would begin. Annual maintenance costs must be secured by each district, based on a proportion of the collections they maintain, and transferred to MCX CMAC to maintain the contract. An estimate of the this by district is in Table 13, but the final costs for each repository will be negotiated during the contract solicitation process. A total of approximately \$1,500,000 will provide for MVD consolidation into three regional centers in five years, including annual maintenance in those years (Table 15).

Table 15. MVD Consolidation for Years 1 to 5

Year	Personnel	Task	Cost Estimate
Year 1	MCX CMAC	Establish three contracts	\$65,000
	MCX CMAC	Contract for processing of bulk collections	\$150,000
	MCX CMAC	Contract with WHS and AAS to coalesce MVD records	\$75,000
	New Orleans and Rock Island District	Continue necessary real-estate research	\$40,000
	St. Paul, Rock Island, Vicksburg, New Orleans	Initiate budget process to secure annual funding (\$10K per district)	\$40,000
		TOTAL YEAR 1	\$370,000
Year 2	MCX CMAC	Contract with WHS, Ames, OSA to prepare all collections.	\$45,000
	St. Paul Rock Island	Assistance for transfer	\$20,000
	MCX CMAC	Transfer collections to UWM	\$10,400
	MCX CMAC	In-processing fee at UWM	\$0
	MCX CMAC	Transfer collections to ISM	\$17,500
	MCX CMAC	In-processing fee at ISM for Rock Island Collections from Iowa	\$161,500
	MCX CMAC	Contract with AAS, LDOA, and Cobb Institute to prepare collections	60,000
		TOTAL YEAR 2	\$314,400
Year 3	Vicksburg New Orleans	Assistance for transfer	\$20,000
	MCX CMAC	Transfer collections to MDAH	\$41,200
	MCX CMAC	In-processing fee at MDAH	\$185,750
	MCX CMAC St. Paul District Rock Island District	Maintain collections at UWM/ISM	\$69,990
		TOTAL YEAR 3	\$316,940
Year 4	MCX CMAC St. Paul District Rock Island District	Maintain collections at UWM/ISM/MDAH with 5% cost increase over Year 3	\$97,869
Year 5	MCX CMAC St. Paul District Rock Island District	Maintain collections at UWM/ISM/MDAH with 5% cost increase over Year4	\$102,762
	MCX CMAC	Establish contracts	\$65,000
		TOTAL YEAR 3	\$167,762
		YEARS 1-5	\$1,266,971
		20% Contingency	\$253,394
			\$1,520,365

5.2 Implementation

In order for MCX CMAC to consolidate MVD collections and to provide for the oversight of long-term curation for the material, direction for MCX CMAC to centrally manage the collections is needed. In the first year of consolidation, MCX CMAC would establish regional center contracts and initiate the necessary bulk processing and record coalescing. There are financial and consistency advantages having all contracts on the same schedule. If MCX CMAC is managing the curation contracts through the St. Louis District contracting office, staggering them requires more time (and labor dollars) be spent on the various contracting actions. The establishment of regional curation contracts will be dependent upon when the collections are ready to move; this includes the expiration of existing curation contracts. MCX CMAC recommends beginning with transfer of collections to the northern and central repositories, followed by transfer of collections into the southern regional center.

Consolidation of materials into regional centers by MCX CMAC requires funding of annual O&M work plans/packages, over and above the budgeted MCX CMAC line-item prepared and submitted by MCX CMAC. The funding would cover the administrative and contracting costs, transfer of the collections, and the in-processing costs. The in-processing costs also cover the first year of maintenance. MCX CMAC submitted a work package for FY15 that includes the first year tasks for repositories to prepare collections for transfer and for districts to continue real estate research and begin budgeting for curation.

Also within the first year, districts must begin coordination in order to include the projected annual maintenance costs in their budget cycles. MCX CMAC can provide appropriate funds to the MVD districts for this coordination and to guide them through the process, if requested. Milestones and priorities will be established with districts upon receipt of funding. Routine, telephonic status updates will be provided throughout the consolidation process to MVD leadership and district personnel.

5.2.1 Indian Tribe Consultation and Coordination

The short duration of this project did not permit tribal consultation by MCX CMAC. MVD tribal liaisons were informed of the initial study. MCX CMAC proposes that Roberta Hayworth, St. Louis District Tribal Liaison, coordinate efforts with the MVD tribal liaisons and/or appropriate district tribal coordinator to determine the most appropriate and effective means of consultation as this effort proceeds in 2015. A specific timeline can be developed at that point, subject to tribal interest and involvement. Upon finalization of this report, a copy should be provided to all tribes with an interest in MVD, with consultation timelines to be established.

5.2.2 NAGPRA Collections

NAGPRA collections will be transferred. MCX CMAC believes that through the consolidation process and dialogue with the tribes, the NAGPRA process will be enhanced. Special care in the handling and transport of this material will be taken, and MCX CMAC has a long history of successful transfers of human remains and NAGPRA materials. A requirement for any regional center contract includes the ability to appropriately house Native American human remains and NAGPRA cultural items, as well to be able to provide for the appropriate tribal access upon district and tribal request.

5.2.3 New Archaeological Holdings

There are two categories of new archaeological findings. For those collections generated from properties that are owned in less than fee, guidance was provided in the 5 September 2014

memorandum from BG Michael Wehr, MVD Commander (Subject: MVD Regional Consolidation of Archaeological Collections, Preliminary Findings, Appendix 5). Project and contracting language should clarify the responsible party for long-term curation, as well as outline the fiscal responsibility for any generated archaeological collections. Corps fiscal responsibility can include funding for the archaeological recovery, processing, analysis, and placement into a long-term repository (i.e., one time processing fee). Corps staff are to work with the landowner and encourage permanent curation of a collections in a manner consistent with Federal curation requirements (ER1105-2-110, Appendix C). The Corps is not responsible for permanent curation for this material.

Consolidation of collections and managing them long-term does not include MCX CMAC responsibility for cultural resources activities or mitigation of sites for districts. When collections are to be recovered from Corps activities on Corps-owned land, the district's specific project budget should include those costs for recovery, processing, analysis, in-processing, and projected annual maintenance. In-processing fees generally include the first year maintenance at a repository, and the district's curation representative should update the annual budget requests to include the new materials. An increase in the volume of collections justifies an increase in the annual expense. MCX CMAC is not assuming any duties or funding responsibilities related to districts' archaeological mitigation and cultural resources activities.

Any regional center contract will enable districts to deposit new collections at any time. Future growth of collections will be anticipated in the contract's option years and communication between the district and MCX CMAC will facilitate this process.

5.2.4 Continued Real Estate Research

The short time frame for this study did not provide for extensive real estate involvement in determining which collections were collected from Corps-owned properties. MCX CMAC engaged district cultural resources points of contact who provided as much information as possible through coordination with their real estate office and prior information (e.g., site lists from current Corps projects). As outlined Section 3.1, depending on the level of district support and availability for this project, site ownership information was verified by the district or it was inferred by MCX CMAC based on project information such as the type of project and information in the project or site report.

Section 3.1.7(5) identified the need for continuing work to define the Corps' collections. MCX CMAC will provide Real Estate and other district staff the funds necessary to complete the research required; it may not be possible to fund all the districts and all the work at one time, however. Importantly, the initial work required is only to determine the type of real estate interest, if any, the Corps had in the land when the collection was made. Was the land owned in fee by the Corps? If not, was there any other Corps property interest (e.g., permanent easement)? The second step, if there was no real property interest, is to determine the landowner at the time of recovery (e.g., other federal, state, local government or private individual/group).

MCX CMAC cannot estimate the resources (costs) associated with each district. Those costs will be dependent upon the organization of each district's real estate records, how much work is required for the different steps of the research, and staff costs. Estimates by each district are required and will be revised as new information is gathered and as the Corps' level of legal responsibility and policy is established (see 5.2.5).

5.2.5 Process for Non-Corps Collections

Collections are the property of the landowner at the time of the excavation/collection of the materials. The landowner can be another federal agency, the state, a local government, or private individual or group. The Real Estate Division should be able to provide information regarding landowner at the time of recovery of the materials, or at a minimum, Corps vs. not Corps. Other federal agencies should assume responsibility for their collections, and collections from state land are the property of the state. All states within MVD have repositories that are responsible for collections removed from state land.

If the landowner is a private group or individual, they are the owners of the artifacts. If the owner does not wish to take possession of the collection, the owner should be encouraged to donate the collection to an appropriate repository. In 2015, MCX CMAC is working with Office of Counsel and HQUSACE to determine the end-point of Corps responsibility for such collections once the original landowner is determined. The need for additional research into the current owners of the collection (e.g., original landowner's heirs) will need to be determined through this process. Additionally, processes and procedures need to be developed once the Corps' responsibility is determined. MCX CMAC cannot propose a process until the end-point of Corps' involvement is determined.

This issue impacts all Corps districts, not just those within MVD. Initiating consolidation within MVD can occur before resolution or proposed process. MCX CMAC, HQ, and Counsel can be working this issue while at the same time the known MVD collections are consolidated into regional centers. The process for those collections that are not Corps owned will occur concurrently, and likely beyond, the initial consolidation.

5.3 Out-Year Planning and Coordination

Once collections are maintained within the regional centers, MCX CMAC's annual line-item funding will be used by the Center's staff to administer the collections. The tasks required for administration of collections are part of our core mission as an MCX and additional funds will not be required for these purposes. This includes coordination with the repositories for rehabilitation of collections and periodic collections assessments.

Each district would be required to provide funds for annual maintenance. The total for all MVD districts is estimated to be between \$94,000 and \$131,000 with a small increase each year of approximately 3% to 5%. Each district would designate a curation representative to coordinate with MCX CMAC. The district curation representative ensures the district is budgeting for the annual maintenance fee and that the fees are provided to MCX CMAC for the curation contracts, reviews requests for loans of district collections, and coordinates with MCX CMAC to establish rehabilitation priorities.

Additionally, the district curation representative would work internally to ensure that any collections resulting from archaeological work contracted by the district is processed, analyzed, and deposited appropriately. This includes ensuring that project and contracting documentation clarify the responsible party for long-term curation, as well as outline the fiscal responsibility for any generated archaeological collections. For those collections in which the landowner is not the Corps, the long term responsible party should not be the Corps. (Memorandum, 5 September 2014, BG Michael C. Wehr, Subject: MVD Regional Consolidation of Archaeological Collections, Preliminary Findings). For those collections in which the landowner is the Corps, the in processing fees at the repository will include the first year

maintenance costs. The district curation representative must ensure that annual budgets are updated include the maintenance of this material, with budget submittal justification as an increase in collection volume.

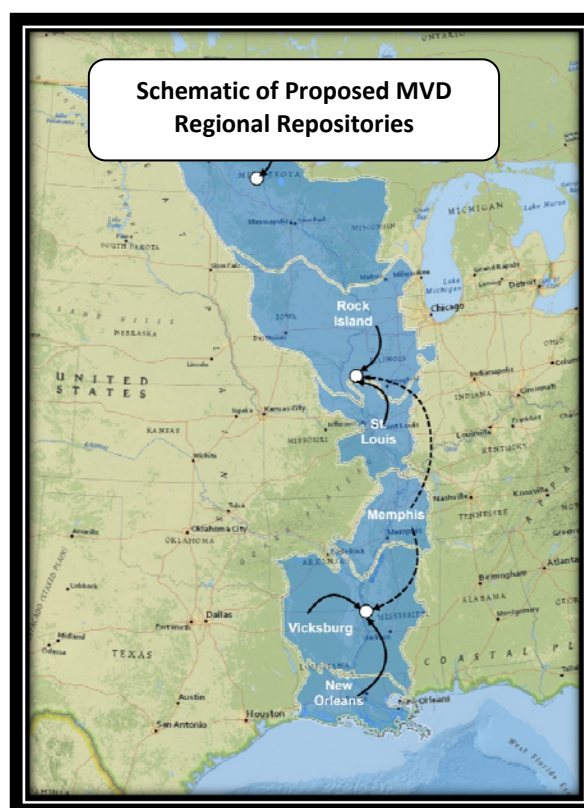
6. Summary

6.1 MVD Curation Study Plan and Results

From April to November 2014, MCX CMAC conducted a study to consolidate MVD collections into regional centers. MCX CMAC reviewed the collections, the repositories, and the funding strategies for MVD collections and analyzed the data. MCX CMAC staff coordinated with districts, SHPOs/State Archaeologists, and repositories in order to fully understand the needs and concerns of all parties. Additionally, MCX CMAC assessed collections and repositories, reviewed collection ownership, and issued a Sources Sought for facilities interested in serving as an MVD regional center.

A total of 48 repositories were reported to house collections from MVD districts, with a volume of more than 7,300 cubic feet. For the first time within MVD, this study reviewed the in-perpetuity responsibility for collections. Long term curation responsibility does not extend to collections that did not originate from Corps property; however, many repositories and district archaeologists have assumed Corps responsibility for any collection in which Corps funds were used—either in whole or in part—during the investigation that produced the collection. Generally, collections are the property of the landowner, and therefore, it is necessary to determine land ownership at the time of collection. Real estate research into land ownership, along with a review of archaeological reports, has enabled MCX CMAC and districts to refine the scope of collection responsibility, reducing the volume of MVD collections by 43% to approximately 4,200 cubic feet stored at 22 repositories.

During discussions with MVD leadership and professional staff, SHPOs/State Archaeologists, and repository staff, the need for better management, including consolidation, was understood and welcomed. To achieve the greatest economy of scale while also addressing the needs of the collections, MCX CMAC has determined that the fewest number of repositories that will adequately represent the cultural and geographic regions of MVD is three—a northern, a central, and a southern facility. Additionally, MCX CMAC oversight for all collections provides the best solution to managing the MVD regional centers, as the single source provides for centralized financial management, technical proficiency that is not lost through attrition, standardized protocols, and centralized data management.



MCX CMAC visited 12 repositories. Five repositories responded to a Sources Sought with proposals to serve as an MVD regional curation center. MCX CMAC assessed all repositories for seven key criteria and identified eight repositories with the potential to serve as a regional center. Only three of the eight, however, currently meet all seven criteria. These are the University of Wisconsin, Madison; Illinois State Museum, Springfield; and the Mississippi Department of Archives and History, Jackson.

Based on a review of the collections, repositories, and funding, the MCX CMAC recommended an operational plan that would see MVD collections consolidated in five years, based upon receipt of necessary funding. For budget purposes, the three facilities that currently meet all criteria for a regional center were used to estimate costs, and the total cost over a five year period is approximately \$1,500,000.

6.2 MVD Collection Consolidation Operational Plan

- Three regional centers are chosen through contract solicitation to house MVD collections—a northern, a central, and a southern facility.
- MVD requests MCX CMAC consolidate MVD collections and centrally manage them through contracts.
- A firm-fixed-price contract is solicited and managed through the St. Louis District for three repositories. Funding for the contract solicitation and administration in out years would be through the MCX CMAC annual line item, with a cost saving of between \$260,000 and \$780,000 every five years.
- Consolidation can occur within five years for an estimated \$1,500,000. Annual O&M work plans/packages, over and above the budgeted MCX CMAC line-item will be prepared and submitted by MCX CMAC to fund the costs incurred by the repositories, the costs to physically transfer the collections, and the in-processing costs. These are one-time costs to move the collections to the regional center. The in-processing costs include the first year of maintenance.
- Districts must budget for and provide annual curation contract maintenance funds to MCX CMAC, based on the proportion of collections they have at each facility, with the total annual maintenance costs ranging between \$94,000 and \$131,000. The time frame for contract solicitation and transfer of collections, along with the first year of annual maintenance covered by the in-processing fees, provides the districts the time to incorporate the projected annual contracting costs into their budget cycles.
- District and Division leadership prioritize the annual maintenance costs. Funds to cover annual maintenance contracts are a must fund/Priority 1 and cannot be redistributed by operational projects.
- MCX CMAC will provide administrative oversight for MVD curation in out-years, working with a district appointed curation contact at each district.

- Phased collection rehabilitation takes place through repositories and the Veterans Curation Program (VCP). Funding from the MCX CMAC's annual remaining O&M line item will be used for the VCP rehabilitation efforts.

6.3 Benefits of MVD Consolidation Program

- A sustainable, effective, and efficient solution to MVD collection storage through the optimized use of specialized experts and resources.
- Fiscal control over costs associated with long-term care of collections, providing MVD leaders with the ability to improve workload and workforce planning and provide for out-year budgeting.
- Five-to-twenty-year cost savings for in contracting and collection administration are estimated to be between \$1,015,000 and \$4,160,000 as compared to district maintaining individual repositories
- Collections moved out of substandard facilities, decreasing risk to the collections caused by improper storage and inadequate environmental and security controls.
- Consistent rehabilitation program for the Corps' collections through continued mission support to the war fighter through VCP laboratories.
- Potential to partner with other federal agencies in the future may further reduce federal government's long-term curation costs.
- Increased access to collections for research, education, STEM, tribal use, and public outreach, better serving our customer, the public.
- Positions USACE as a national asset that provides leadership and technical expertise in formulating and implementing innovative solutions to cultural resources stewardship

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Appendix 1

Copy of MVD Policy Memorandum



DEPARTMENT OF THE ARMY
MISSISSIPPI VALLEY DIVISION, CORPS OF ENGINEERS
P.O. BOX 80
VICKSBURG, MISSISSIPPI 39181-0080

REPLY TO
ATTENTION OF:

CEMVD-PD-SP

11 FEB 14

MEMORANDUM FOR

Commander, St. Paul District
Commander, Rock Island District
Commander, St. Louis District
Commander, Memphis District
Commander, Vicksburg District
Commander, New Orleans District

SUBJECT: Policy Letter Regarding Regionalization

1. In speaking with Dr. Trimble and others during my visit to the St. Louis District Veterans Curation Program, I was reminded that USACE is responsible for one of the largest archaeological collections in the United States. Comprising approximately 49,000 cubic feet of artifacts and 3,300 linear feet of associated records, these collections are currently stored in 165 repositories around the country. Only 5 percent are housed in repositories that receive funds for maintenance, resulting in collections that do not meet Federal standards and that are not accessible and exploitable by the wider archaeological community.

2. As I understand it, the Mandatory Center of Expertise for the Curation and Management of Archaeological Collections (MCX-CMAC) has proposed a solution to this agency-wide problem by employing a regional enterprise model that will consolidate USACE collections into regional centers. Regionalizing archaeological collections will provide significant savings over the next 15 to 20 years, will reduce duplication of effort by eliminating dozens of unnecessary curation contracts, and will also reduce the number of different administrative strategies and collections management procedures that USACE must adhere to if we are working with a multitude of independent repositories. Finally, consolidation significantly increases access to the collections for educators, researchers, tribal members, and others of the general public, all of whom have a compelling interest in these materials.

CEMVD-PD-SP

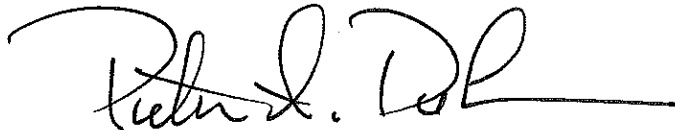
SUBJECT: Policy Letter Regarding Regionalization

3. MCX-CMAC has the knowledge and capability to initiate this process of consolidation. I, therefore, direct MCX-CMAC to prepare a plan outlining the process for regional consolidation applied to MVD, a division with over 5,400 cubic feet of artifacts and 365 linear feet of associated records housed in 44 different repositories. Through consultation with division and district staff, the plan will update information on the location, content, and condition of MVD's collections, determine the status of existing curation contracts and agreements, and identify current mechanisms used for funding curation of USACE collections. The plan will identify potential regional curation facilities by evaluating current and future available space and infrastructure, support facilities, qualified staff, outreach and educational capabilities, institutional support, and standardized processes (all in accordance with the Federal curation regulation, 36 CFR Part 79). The plan will also outline funding and contracting alternatives for the most cost effective and efficient method of resourcing long-term curation within USACE.

4. I encourage the consideration of housing appropriate portions of our USACE artifacts within other facilities run by organizations that make historical and natural artifacts available to educators, researchers, tribal members, and others of the general public. We have partnerships with some organizations like this now and could develop new partnerships with others in the region, improving our own museums and public interpretation skills and relationships.

5. The report and operational plan for MVD regionalization will be delivered to me not later than 31 December 2014.

6. The MVD point of contact is Mr. Philip Hollis, CEMVD-PD-SP, (601) 634-5293.



PETER A. DELUCA
Brigadier General, USA
Commanding

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Appendix 2

Copy of Sources Sought

* modification

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B--MISSISSIPPI VALLEY DIVISION ARCHAEOLOGICAL CURATION SERVICES CONTRACT

Solicitation Number: W912P914X0007

Agency: Department of the Army

Office: U.S. Army Corps of Engineers

Location: USACE District St. Louis

Notice Details

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Jul 02, 2014

5:29 pm

Changed

Jul 31, 2014

5:27 pm

Solicitation Number:

W912P914X0007

Notice Type:

Modification/Amendment

Synopsis:

Added: Jul 02, 2014 5:29 pm Modified: Jul 31, 2014 5:27 pm [Track Changes](#)

Sources Sought

Mississippi Valley Division Archaeological Curation Services Contract

Purpose: To identify small business facilities/repositories interested in competing on a possible future RFP for curation services for Mississippi Valley Division, U.S. Army Corps of Engineers' (Corps) archaeological collections. If any facilities/repositories other than small businesses are interested, they may respond to this Sources Sought at this time.

Indefinite Delivery Indefinite Quantity (IDIQ), FFP Contract Base Year with Four Option Years

Minimum Per Task Order: \$xx,xxx

Maximum Per Task Order: \$xx,xxx

Cumulative Guaranteed Minimum: \$xx,xxx per Base Year (\$xx,xxx per option year should options be exercised)

Cumulative Guaranteed Maximum: \$xxx,xxx per Year

This is a Sources Sought and is not a request for

quotation. It will not result in any award of contract and no

GENERAL INFORMATION

Notice Type:

Modification/Amendment

Original Posted Date:

July 2, 2014

Posted Date:

July 31, 2014

Response Date:

September 30, 2014

Original Response Date:

August 1, 2014

Archiving Policy:

Automatic, on specified date

Original Archive Date:

August 31, 2014

Archive Date:

October 30, 2014

Original Set Aside:

Total Small Business

Set Aside:

Total Small Business

Classification Code:

B – Special studies and analysis - not R&D

NAICS Code:

541 – Professional, Scientific, and Technical Services/541720 –

remuneration will be forthcoming for the preparation of a response to this Sources Sought.

Research and
Development in the Social
Sciences and Humanities

General: The work covered by this Sources Sought includes housing, stabilizing, preserving, transporting, and providing collections management services and access to archaeological materials and associated records (hereafter archaeological collections) generated in conjunction with U.S. Army Corps of Engineers activities in the Mississippi Valley Division (in the states of North Dakota, South Dakota, Minnesota, Wisconsin, Iowa, Illinois, Missouri, Kentucky, Tennessee, Arkansas, Mississippi, and Louisiana). 36 Code of Federal Regulations (CFR) Part 79-Curation of Federally-Owned and Administered Archeological Collections (Enclosure 1)-states in 79.6(b)(1), that, quote mark When possible, the collection should be deposited in a repository that: (ii) Stores and maintains other collections from the same site or project location; or (iii) Houses collections from a similar geographic region or cultural area. quote mark Additionally, 36 CFR 79.6(b)(2) recommends that collections quote mark should not be subdivided and stored at more than a single repository unless such subdivision is necessary to meet special storage, conservation, or research needs. quote mark Finally, the two components of these collections-material remains and associated records- quote mark should be deposited in the same repository to maintain the integrity and research value of the collection. quote mark Except in those instances where nonfederally owned material remains are retained and disposed of by the owner [36 CFR 79.6(b)(3)]. The Mississippi Valley Division (MVD) will curate its archaeological collections in a limited number of facilities/repositories in the states that fall within MVD's area of responsibility.

Facilities/Repositories interested in housing MVD's collections should have the capacity to store between 2,000 and 5,000 cubic feet of the Corps' archaeological materials and up to 400 linear feet of Corps records, and meet the standards set forth in 36 CFR 79.9. The facilities/repositories interested must accept collections from any state within MVD and must accept collections that include Native American Graves Protection and Repatriation Act (NAGPRA) defined human skeletal materials and cultural objects. The facilities/repositories must accept collections that are not, upon delivery, housed/contained within the repositories' preferred

during non-work hours. The contract duration shall be one Base Year with four Option Years to be issued at the discretion of the Contracting Officer.

Contract Areas and Construction Limits: The primary contract areas consist of most of the states of Minnesota, Wisconsin, Iowa, Illinois, Mississippi, and Louisiana and portions of the states of North Dakota, South Dakota, Missouri, Tennessee, Kentucky, and Arkansas.

Required Trades: The facilities/repositories shall have the capabilities of supplying trades including, but not limited to curators, collections managers, conservators, archivists, electronic records managers, archaeologists (including historic archaeologists), archaeological technicians, and physical anthropologists.

Required Equipment: No specific equipment is required of the facilities/repositories; however, as specified in 36 CFR 79.9(2), the facilities/repositories must be able to quote mark dedicate the requisite facilities, equipment, and space to properly store, study and conserve the collection.

Space used for storage, study, conservation, and, if exhibited, any exhibition must not be used for non-curatorial purposes that would endanger or damage the collection. quote mark Additionally, the facilities/repositories must quote mark keep the collection under physically secure conditions within storage, laboratory, study and any exhibition areas quote mark [see 36 CFR 79.9(3)].

Responders to this Sources Sought should submit a five to ten page narrative that outlines facility/repository capabilities including.

1. Available space for artifacts and records.
2. A demonstrated ability to maintain an archaeological collections management center that will provide for the long-term curation of archaeological collections in accordance with 36 CFR 79.9 and ER/EP 1130-2-540 (digital images may be included as supporting evidence).
3. A demonstrated ability to arrange for the loan or display of all or part of a collection upon request of agencies, organizations, institutions, or individuals having adequate facilities for study or display (a description of loan arrangements with others will suffice).
4. Maintenance of a computer-assisted collections-management-retrieval system that will permit Corps and other qualified individuals and institutions access for study, loan, education, or public interpretation of collections.
5. Information regarding fee schedules for one-time

accessioning/processing fees (which are separate from annual curation services costs).

6. Information regarding upgrade or rehabilitation schedules for archaeological collections, including discussion of how annual inspections and preparation of a report that evaluates the condition of each collection in accordance with 36 CFR 79.11 and ER/EP 1130-2-540 will be undertaken.

7. Information regarding the professional curatorial staff that includes Qualified Museum Professionals as described in 36 CFR 79.4(b)(h).

8. Either a copy of, or a reference to the web location of, the facility/repository guidelines. (These guidelines may be attached to the ten page narrative).

Please submit this information or questions to Lisa White at lisa.white@usace.army.mil.

Contracting Office Address:

USACE District St. Louis, ATTN: CEMVS-CT, 1222 Spruce Street, St. Louis, MO 63103-2833

Place of Performance:

USACE District St. Louis ATTN: CEMVS-CT, 1222 Spruce Street St. Louis MO
63103-2833
US

Point of Contact(s):

Lisa Marie White, 314-331-8518

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Appendix 3

Overviews of Repositories that have the potential to serve as an MVD regional center.

- (1) Arkansas Archeological Survey/University of Arkansas Museum—AAS/UAM**
- (2) Illinois State Museum—ISM**
- (3) Jackson Group Archaeological Repository—JGAR**
- (4) Mississippi Department of Archives and History—MDAH**
- (5) Mississippi State University, Cobb Institute of Archaeology—Cobb**
- (6) Office of Cultural Development, Louisiana Division of Archaeology—LDOA**
- (7) Office of the State Archaeologist, Iowa—OSA**
- (8) University of Wisconsin, Madison—UWM**

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Arkansas Archaeological Survey and University of Arkansas Museum (AAS/UAM)



MCX CMAC conducted an on-site visit to AAS/UAM, Fayetteville, and they responded to the Sources Sought. AAS/UAM currently houses collections from Vicksburg District that totals 114 cubic feet.

In summary, AAS/UAM does not meet two criteria—(1) they do not currently have space for all MVD collections, but indicate they would upgrade the facility to add the additional space; and (2) any decision to curate collections from out-of-state would have to be made by the University of Arkansas Board of Trustees. AAS/UAM has a robust program to digitize document collections and actively participates in and supports outreach, research, and educational programs throughout the state (Table 1).

AAS/UAM Overview: AAS/UAM is a part of the University of Arkansas System, whose mission is to study and protect archeological sites in Arkansas, to preserve and manage information and collections from those sites, and to provide education and communicate on Arkansas history and prehistory to the public. AAS/UAM has 11 research stations around the state to carry out this mission.

AAS/UAM Repository: The University of Arkansas Collection Facility in Fayetteville serves as the main repository for AAS/UAM collections. The facility was constructed in 1999 specifically for archaeological curation and support offices. The facility currently houses a total of 9,760 cubic feet of artifacts and records. The facility is near capacity, with an additional 836 cubic feet available if current collections are repackaged. Additionally, AAS/UAM has proposed building a mezzanine in the collections storage area or expanding the building to the north to offer another 1,728 cubic feet space for collections.

AAS/UAM Collection Storage: Collections are housed on powder-coated, adjustable metal shelves and on space-saver mobile shelving units. Primary containers consist of Rubbermaid® storage bins, which, according to AAS/UAM, are approved by the National Park Service for storage of and access to archaeological collections. Special collections are housed in individually constructed, acid-free, corrugated blue board boxes.

Table 1. Summary of AAS/UAM Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections		√	Currently, there is not enough space to accommodate all MVD collections. An additional 836 cubic feet will be available if existing collections are reorganized. An additional 1,728 cubic feet would be available via installation of a mezzanine or building addition.
Broad Collection Acceptance Policies		√	The University of Arkansas Board of Trustees would have to approve acceptance of collections from outside of Arkansas.
Contracting Ability	√		Has previously contracted with Vicksburg District.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation.
Database Capabilities	√		Web-based software program called the Automated Management of Archeological Site Data in Arkansas (AMASDA). Online access is provided to State and Federal agencies.
Research Support and Outreach	√		Actively participates in and supports outreach, education, and research. Affiliated with numerous universities across the state through their 11 research stations.

Illinois State Museum (ISM) Research and Collections Center



MCX CMAC conducted an on-site visit to ISM, and they responded to the Sources Sought. ISM currently houses collections from St. Louis and Rock Island Districts within MVD that totals 2,708 cubic feet. In addition to MVD districts, ISM curates collections from Kansas City, Detroit, and Louisville districts.

In summary, ISM meets all criteria to serve as a MVD curation center. ISM's current repository has space for an additional 9,000 cubic feet of collections. ISM will accept MVD collections from any state and at any level of rehabilitation. ISM manages collections with an Access database and has a robust program to digitize box level inventories. ISM actively supports research and educational programs (Table 2).

ISM Overview: ISM is a system of museums and galleries with the mission to foster an appreciation of the history, living world, and art of Illinois and the surrounding states. ISM is headquartered in Springfield, with branch facilities throughout the state.

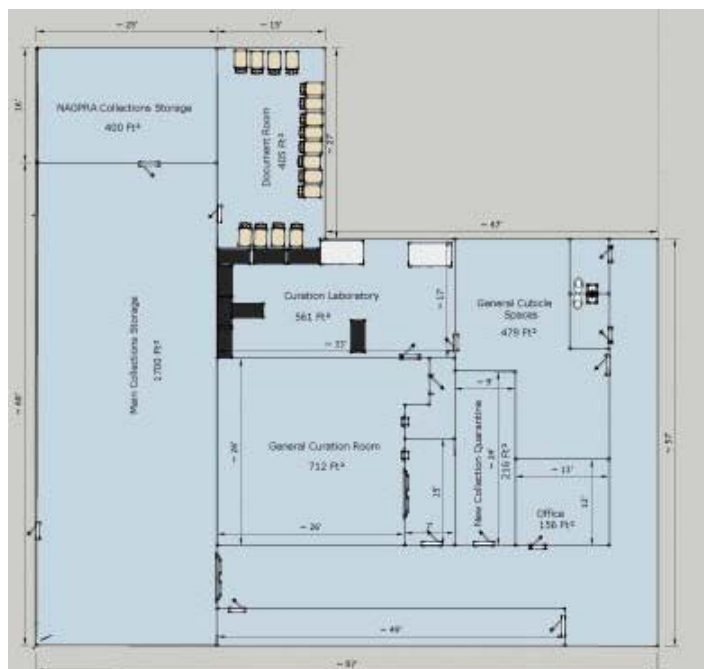
ISM Repository: ISM's Research and Collection Center (ISM RCC) in Springfield is a 100,000-square-foot curation facility that maintains ISM's collections in botany, zoology, geology, decorative arts history, and anthropology. The Anthropology Section's storage area maintains anthropological and archaeological collections and is 10,800 square feet. The Anthropology Section is secured with key card access and equipped with compact shelving units, Delta Design® cabinets, and 24-hour temperature and humidity monitoring and control. ISM RCC has room for an additional 9,000 cubic feet of archaeological collections and associated project documentation without any modification of the existing Anthropology Section storage area.

ISM Collection Storage: When collections arrive at ISM, they are placed in the ISM RCC decontamination room for inspection and treatment for insects, rodent, and/or mold infestation. Any remedial treatments are performed before collections are transported to the Anthropology Section. Artifact collections are stored in acid-free curation boxes that measure 15 x 10 x 9.5 inches and hold 0.94 cubic feet of artifacts each. Original project documentation is stored in the Anthropology Section next to the associated archaeological collection in similar sized boxes, and accession and catalog files are stored in the site file room and the processing room. Some MVD collections at ISM require upgrades into archival secondary containers.

Table 2. Summary of ISM Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections	√		An additional 9,000 cubic feet is available in the Anthropology Section for collections.
Broad Collection Acceptance Policies	√		Agrees to accept collections from all MVD states, at any level of rehabilitation, and that include NAGPRA collections.
Contracting Ability	√		Currently maintains a curation contract with the St. Louis District for a base year (FY14) with four option years.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation.
Database Capabilities	√		Maintains Access databases. Currently digitizing all box-level inventories for collections.
Research Support and Outreach	√		Actively supports the educational, research, and outreach for ISM branch facilities. Currently managing over 50 loans (non-USACE) of archaeological materials to universities, museums, historical societies, and visitor centers for study and exhibition.

Jackson Group Anthropological Laboratory (JGAR)



The Jackson Group responded to the Sources Sought. MCX CMAC did not conduct an on-site visit the repository, which does not house Corps collections.

In summary, JGAR is a newly created facility that the Jackson Group, a private consulting firm, is opening to federal agencies for archaeological curation on a fee-for-services basis. The Jackson Group has partnered with the Center for Digital Antiquity to preserve associated records in a digital format. As a private firm, Jackson Group lacks the inherent educational and outreach mission of those repositories associated with a museum, university, or state educational system (Table 3).

JGAR Overview: The Jackson Group is a professional environmental consulting service that focuses on Section 401 and 404 permitting for environmental studies for threatened and endangered species and benthic macro invertebrates. The Jackson Group has partnered with the Center for Digital Antiquity of Arizona State University to curate associated records with the Digital Archaeological Record (tDar).

JGAR Repository: The Jackson Group maintains a newly created facility called the Jackson Group Anthropological Repository (JGAR) in Richmond, Kentucky. The existing building was retrofitted to meet National Park Service (NPS) guidelines outlined in the NPS Museum Handbook and pursuant to 36 CFR Part 79. The repository consists of eight rooms dedicated to the accessioning, curation, cataloguing, research, and long-term storage of ethnographic and archaeological collections. There is over 25,000 cubic feet of space available for archaeological collections (20,400 cubic feet in the main collection room and 4,800 cubic feet in the special collection room). There is a document room that has shelving units/cabinets that would hold at least 620 linear feet of documents, but the room also has space for additional storage units if required.

JGAR Collection Storage: Incoming collections would be retained in quarantine to prevent the introduction of contaminants to the collection and for the monitoring and stabilization of materials. According to the JGAR Guidebook (their curation procedures), artifacts are to be stored within polypropylene storage bags that are placed in water-resistant plastic storage containers on powder coated steel shelving units. The Jackson Group state that they can rehabilitate and upgrade collections, however it is not clear if they have previously undertaken rehabilitation. It is also not clear if the necessary staff is available as their documentation states that they would add staff if needed.

Table 3. Summary of JGAR's Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance		√	The facility has yet to be used as a curation center, and the security, environmental, and pest control protocols and procedures have not been verified as adequate during use. It is unclear if the proper professional staff are on site, as per their documentation, "as JGAR grows in size and the collections increase new staff will be hired to maintain the level of excellence required."
Adequate Space for MVD Collections	√		Adequate space for all MVD collections.
Broad Collection Acceptance Policies	√		Will accept collections from all states within MVD, will accept NAGPRA collections, and will accept collections that require upgrading.
Contracting Ability	√		A Service-Disabled Veteran-Owned Small Business that can accept federal contracts.
Collection Rehabilitation Ability		√	It does not appear that collections have been rehabilitated on site previously and their processing capabilities are not known.
Database Capabilities		√	Currently do not maintain databases for archaeological collections they manage on site.
Research Support and Outreach		√	Have partnered with the Center for Digital Antiquity to maintain digital copies of all associated records that would be accessible to the broader public. Jackson Group does not have an inherent educational or outreach mission and do not actively seek out research and education use for collections.

Mississippi Department of Archives and History (MDAH)



MCX CMAC conducted an on-site visit to MDAH in Jackson, Mississippi. They did not respond to the Sources Sought. MDAH currently houses collections from Vicksburg District that totals six cubic feet of artifacts.

In summary, MDAH meets all criteria to serve as an MVD curation facility and has a stated goal to expand from a Mississippi collections repository to a central southeastern regional repository. The curation facility can accommodate over 20,000 cubic feet of additional material. While all new collections are entered into their database, the database is not fully populated with previously deposited collections. MDAH has an active education and outreach program (Table 4).

MDAH Overview: MDAH, founded in 1902, is a comprehensive historical agency that collects, preserves, and provides access to the archival resources of the state, administers museums and historic sites, and oversees statewide programs for historic preservation, government records management, and publications. A strategic goal of MDAH is to expand from a Mississippi collections repository to a central southeastern regional repository. MDAH is active in outreach, education, and research throughout the state through programs such as Archaeology Expo, Gathering on the Green, History is Lunch, Archaeology Month, Traveling Trunks, and Lesson Plans for Teachers. The Museum Division also hosts Native American powwows at several state parks in Mississippi.

MDAH Repository: The Historic Preservation Division is located in the Charlotte Capers Archives and History Building in Jackson, which was constructed in 1971 specifically for curating and conserving the state's records and collections. The collection storage area on the third floor of the building houses artifacts and records and a collections' processing laboratory. The curation facility is secured through limited access and keyed entry. The building meets all fire safety, pest control and monitoring, and HVAC requirements, and is ADA compliant. Without modification, MDAH's current repository can accommodate an additional 20,226 cubic feet of collections.

MDAH Collection Storage: Collections are housed on compact mobile enameled-metal shelves. Most primary containers consist of acid-free cardboard boxes or chloroplast boxes with telescoping lids; however, the current Vicksburg District collections are housed in acidic cardboard boxes and acidic paper bags that upgrades to archival quality storage.

Table 4. Summary of MDAH Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections	√		Currently have 20,000+ cubic feet available.
Broad Collection Acceptance Policies	√		Agrees to accept collections from all MVD states, at any level of rehabilitation, and that include NAGPRA collections.
Contracting Ability	√		Has ability to contract with federal agencies.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation.
Database Capabilities	√		All collections and associated records are accessioned into the MDAH Re:Discovery database system, which is similar to the ANCS+ database that the National Park Service currently uses.
Research Support and Outreach	√		Actively participates in and supports outreach, education, and research.

Mississippi State University, Cobb Institute of Archaeology (Cobb Institute)



MCX CMAC conducted an on-site visit to the Cobb Institute in Starkville, Mississippi. They did not respond to the Sources Sought. The Cobb Institute currently houses collections from Vicksburg District that totals 298 cubic feet of artifacts.

In summary, the Cobb Institute meets all criteria with the exception of adequate space. If current collections are reorganized, an additional 1,000 cubic feet of materials could be accepted, and space for an additional 5,000 cubic feet requires the building to be expanded. The Cobb Institute has an active outreach program through the University (Table 5).

Cobb Institute Overview: The Cobb Institute of Archaeology is a research-and-service unit of the College of Arts & Sciences of Mississippi State University. It was founded in 1971 to promote archaeological research and education at Mississippi State University related to the Middle Eastern origins of Western Civilization and to the Indians of the South, particularly in Mississippi. The Cobb Institute supports research and education through their affiliation with the University and runs the Lois Dowdle Cobb Museum of Archaeology. The annual program of the Institute features public lectures, tours, and workshops, and the staff is routinely engaged in on- and off-campus outreach activities.

Cobb Institute Repository: The repository building is located on the campus of Mississippi State University in Starkville and serves solely as an archaeological curation and processing facility. In addition to the split-level storage area, the building has two offices and a large laboratory space. With reorganization of collections, the Cobb Institute can accommodate an additional 1,000 cubic feet of artifacts and records. The original building design allows the back wall to be expanded, providing space for an additional 5,000 cubic feet of collections. The Cobb indicated that building modification would be a Corps expense if the space was needed for consolidation of MVD collections within their facility.

Cobb Institute Collection Storage: Collections are housed on fixed metal shelves. Each shelving unit spans two floors, with the second story accessed by semi-open metal flooring. The majority of collections meet standards with primary containers of acid-free cardboard boxes with telescoping lids and secondary containers of 4-mil zip-lock bags. Records are housed in archival quality boxes based on their individual needs.

Table 5. Summary of Cobb Institute Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections		√	Must reorganize collections to make 1,000 cubic feet of space available. If building is expanded at Corps expense, 5,000 additional cubic feet are available.
Broad Collection Acceptance Policies	√		Agrees to accept collections from all MVD states, at any level of rehabilitation, and that include NAGPRA collections.
Contracting Ability	√		Has contracted with Vicksburg District in the past.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation.
Database Capabilities	√		Maintains a collections database.
Research Support and Outreach	√		Actively participates in and supports education and research.

Office of Cultural Development, Louisiana Division of Archaeology (LDOA)



MCX CMAC conducted an on-site visit to LDOA. They did not respond to the Sources Sought. LDOA currently houses collections from New Orleans and Vicksburg Districts. This material totals 227 cubic feet.

In summary, LDOA meets all requirements except for adequate space. LDOA can currently accommodate up to 400 cubic feet of additional material without any modifications to the existing facility. If additional compact shelving units were installed, 4,200 cubic feet of space for collections would be available. LDOA has an active outreach and education program with active partnerships with four state universities (Table 6).

LDOA Overview: LDOA is part of the Louisiana Department of Cultural Development and is the mandated repository for private and state-owned archaeological collections in Louisiana. LDOA has an active outreach and education program and has active partnerships with four state universities. LDOA maintains classroom and library/museum traveling exhibits, hosts and organizes Louisiana archaeology month activities, and hosts virtual books pertaining to Louisiana history and prehistory on their website.

LDOA Repository: LDOA is located on the entire second floor and one room on the first floor of a building constructed in the 1980s to originally serve as offices and storage for the state government. The second floor of the building was retrofitted in the last five years for use as a curation facility. The storage areas occupy three separate rooms and currently house about 4,000 cubic feet of artifacts. LDOA can accommodate another 400 cubic feet of artifacts with no modifications. If additional compact mobile shelving is acquired, an additional 4,200 cubic feet of artifacts could be housed.

LDOA Collection Storage: The storage areas are equipped with both compact mobile shelving units and metal fixed shelves. Primary containers for artifacts consist of acidic and acid-free hinged-lid cardboard boxes. Secondary containers are 2- and 4-mil zip-lock bags, a few paper bags, and cloth bags for samples. Records are housed in acid-free, metal-edged, hinged-lid 0.5 cubic foot boxes. Oversized collections are housed in the same type of boxes or loose and wrapped in ethafoam. Special collections are housed in opaque white plastic lidded bins containing 4-mil zip lock bags.

Table 6. Summary of LDOA Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections		√	Can accept approximately 400 cubic feet of materials with no changes to the facility. An additional 4,200 cubic feet of space can be made available with additional compact mobile storage units.
Broad Collection Acceptance Policies	√		Agrees to accept collections from all MVD states, at any level of rehabilitation, and that include NAGPRA collections.
Contracting Ability	√		Has contracted with Vicksburg District in the past.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation.
Database Capabilities	√		Maintains a collections database.
Research Support and Outreach	√		Actively participates in and supports outreach, education, and research. Partners with universities across the state and manages a number of active loans for research and education.

Office of the State Archaeologist, Iowa (OSA)



MCX CMAC conducted an on-site visit to OSA, and they responded to the Sources Sought. OSA currently houses collections from Rock Island District. This material totals 250 cubic feet.

In summary, OSA does not meet two criteria—(1) they generally do not accept collections from outside of Iowa unless they have direct relevance to Plains, Midwestern, or Iowa archaeology and (2) OSA's current repository is nearly at capacity, with 100 cubic feet of space available. OSA states that an additional building will be made available when space is required. OSA has a complete database, a robust program to digitize document collections, and actively supports research and educational programs throughout the state (Table 7).

OSA Overview: OSA is a research and educational unit of the University of Iowa, and supports a multitude of services including the curation of archaeological collections and associated documentation, maintenance and access to the Iowa Site Files, performance of state wide archaeological and architectural history investigations, and publication of reports, papers, and pamphlets on Iowa Archaeology.

OSA Repository: The repository occupies a building at 700 Clinton Street, Iowa City, that was constructed in 1959. The collections are stored in a basement/subfloor room (B9) and on the main floor of the building in Room 120. B9 houses artifacts only, including oversized artifacts. Room 120 houses artifacts and records. These two areas offer a total of just over 6,900 cubic feet of space, and both rooms use compact shelving units. B9 is at capacity and Room 120 has space for an additional 100 cubic feet. Per the Sources Sought response, the University of Iowa has a building with an additional 10,000 cubic feet of space for OSA artifacts and documents if needed. The specific building or buildings have not been identified, and no details are available.

OSA Collection Storage: Artifact collections are stored in cardboard boxes with telescoping lids. Record collections are in archival boxes with hinged lids. The artifact boxes are smaller than the standard archival collection storage box. All boxes in Room 120 are archival, while about half in B9 require re-boxing. Within non-archival boxes, some of the MVD collections remain in paper field bags and need to be upgraded to archival secondary containers.

Table 7. Summary of OSA's Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections		√	Only 100 cubic feet of space available. Requires use of an additional, unnamed facility to be provided by the University of Iowa.
Broad Collection Acceptance Policies		√	Per the Sources Sought response, OSA is a repository that is "primarily for collections and associated records from the state of Iowa. Out of state collections may be accepted if they are Plains or Midwest focused or have direct relevance to Iowa Archaeology."
Contracting Ability	√		Has ability to contract with agencies.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation. Have been upgrading all collections through a phased rehabilitation schedule based on a 2004 collection assessment.
Database Capabilities	√		Maintains an Access 2010 database to manage collection and ProCite database to manage associated records. Remote access to catalog data for collections, documents, records, and photographs are available through the I-Sites Pro website.
Research Support and Outreach	√		In 2007 began a digital initiative to store and preserve all of OSAs document collections electronically. Supports local education through a mobile archaeology van/bus. Actively support the academic mission of the University of Iowa with outreach and education programs.

University of Wisconsin, Madison (UWM)



MCX CMAC conducted an on-site visit to UWM, and they responded to the Sources Sough. UWM housed material from St. Paul District. This material is stored in four boxes.

In summary, UWM meets all criteria for a MVD curation center. There is at least 2,000 cubic feet of storage space within the primary repository, with off-site storage available if more than 2,000 cubic feet were required. UWM has previously been contracted to complete collection rehabilitation for Corps materials. The mission of the repository is focused on education and outreach, and the repository facilitates 10-25 collection loans per year. The University system supports several galleries that provide venues for display (Table 8).

UWM: The University of Wisconsin system is a system of public higher education that includes 13 four-year universities and 13 two-year campuses. The archaeological repository at the University of Wisconsin-Madison is part of the Department of Anthropology. The mission of the repository is curation of archaeological and anthropological collections, with emphasis on use and access for research, teaching, outreach, education, and interpretation/exhibition.

UWM: The repository is located in Sewell Hall on the University campus, with two separate rooms comprising the collection storage areas. The rooms are climate controlled, monitored, secured, and routinely inspected for pests. There is at least 2,000 cubic feet of storage space for Corps collections and 400 cubic feet of space for records. In addition, the repository has access to an additional 5,000-square foot climate-controlled leased space about 1.5 miles from the main repository. At least another 4,000 cubic feet of artifacts and 1,000 cubic feet of records could be housed in this facility if outfitted with compact shelving. Grant funding from the university system can be used to defray costs to the government for any upgrades required at the second location.

UWM Collection Storage: MVD artifact collections are stored in three archival cardboard boxes with telescoping lids. The three artifact boxes measure 12 x 10 x 15 inches. Records, all of which have been digitized, are in one archival box with hinged lid, measuring 10.5 x 5 x 12 inches. The original project documentation is stored on the repository shelves next to the associated archaeological collection. Most of the collections meet standards, with one box requiring transfer of artifacts into archival secondary containers.

Table 8. Summary of UW-Madison's Capabilities

Requirement/Capability	Yes	No	Comment
36 CFR Part 79 Compliance	√		Meets all 36 CFR Part 79 requirements for infrastructure, environment, pest control, management, and professional staff.
Adequate Space for MVD Collections	√		Able to house 2,000 cubic feet of artifacts and 400 cubic feet of records in current space. An additional 5,000 cubic feet of storage space available off-site, but this would require installation of compactor shelving and upgrades to the security system.
Broad Collection Acceptance Policies	√		Agrees to accept collections from all MVD states, NAGPRA materials, and collections requiring upgrades upon deposition.
Contracting Ability	√		Has ability to contract with the federal government.
Collection Rehabilitation Ability	√		Has staff and space to conduct collections rehabilitation. Currently upgrading more than 130 cubic feet of artifacts and 4 linear feet of records of Corps collections from South Dakota.
Database Capabilities	√		Uses Past Perfect.
Research Support and Outreach	√		The mission of the repository is focused on education and outreach. Regularly loans or displays collections or portions thereof, and facilitates 10–25 collection loans per year. The university system supports several galleries that provide venues for display.

Appendix 4

Cost Estimates for MVD Operation Plan

MVD Consolidation Costs for Collections Transfer

UWM Transfer

District	Current Repository	Cubic feet	Final Repository	Transfer method*	Cost Estimate
St. Paul	State Historical Society of North Dakota, Bismarck, ND	10	UWM	mail	\$ 375.00
St. Paul	South Dakota Archaeological Research Center	1	UWM	mail	\$ 25.00
St. Paul	University of Wisconsin, Madison	4	UWM	n/a	\$ -
St. Paul	University of Wisconsin, Mississippi Valley Archaeological Center, LaCrosse	18	UWM	truck	\$ 9,700.00
St. Paul	Wisconsin Division of Historic Preservation, State Historical Museum, Madison	35	UWM	truck	
St. Paul	USACE St. Louis District Archaeological Laboratory	16	UWM	n/a (rehab)	\$ -
St. Paul	Mankato State University, MN	1.3	UWM	mail	\$ 25.00
St. Paul	Minnesota Historical Society	3.5	UWM	mail	\$ 75.00
St. Paul	Science Museum of Minnesota, St. Paul	2.5	UWM	mail	\$ 50.00
St. Paul	University of Minnesota, Duluth, Superior National Forest Repository	1.5	UWM	mail	\$ 25.00
St. Paul	University of South Dakota, Vermillion	4.2	UWM	mail	\$ 100.00
		97			\$ 10,375.00

In-processing fee: 77 cubic feet to transfer
at \$0/cubic foot = \$0

ISM Transfer

District	Current Repository	Cubic feet	Final Repository	Transfer method*	Cost Estimate
Rock Island	Iowa State University, Ames, IA	396	ISM	truck	\$ 17,500.00
Rock Island	Iowa Office of the State Archaeologist, University of Iowa, Iowa City, IA	250	ISM	truck	
Rock Island	Illinois State Museum, Springfield, IL	240	ISM	n/a	\$ -
St. Louis	Illinois State Museum, Springfield, IL	2,468	ISM	n/a	\$ -
		3,354			\$ 17,500.00

In-processing fee: 646 cubic feet to transfer
at \$250/cubic foot = \$161,500

MDAH Transfer

District	Current Repository	Cubic feet	Final Repository	Transfer method*	Cost Estimate
Vicksburg	Arkansas Archaeological Survey/University of Arkansas Museum, Fayetteville, AR	114	MDAH	truck	\$ 10,600.00
Vicksburg	Arkansas Archaeological Survey, Magnolia Station, Magnolia, AR	29	MDAH	mail	\$ 725.00
Vicksburg	Louisiana Division of Archaeology, Baton Rouge, LA	79	MDAH	truck	\$ 17,500.00
New Orleans	Louisiana Division of Archaeology, Baton Rouge, LA	148	MDAH	truck	
Vicksburg	University of Louisiana, Monroe, LA	3	MDAH	mail	\$ 75.00
Vicksburg	Mississippi Department of Archives and History, Jackson, MS	6	MDAH	n/a	\$ -
Vicksburg	Mississippi State University, Cobb Laboratory, Starkville, MS	298	MDAH		\$ 10,300.00
Vicksburg	Panamerican Consultants, Memphis, TN	41	MDAH	mail	\$ 975.00
New Orleans	Goodwin and Associates, New Orleans, LA	31	MDAH	mail	\$ 975.00
		749			\$ 41,150.00

In-processing fee: 743 cubic feet to transfer
at \$250/cubic foot = \$185,750

*transfer method = how collections will be physically moved to regional center; for the "truck" transfer, the cost includes the physical move of the materials by MCX CMAC staff, inclusive of labor and travel costs.

*In-processing fees = UWM based on current charge to St. Paul; ISM and MDAH based on published rate

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Appendix 5

**September 2014 MVD Memorandum
MVD Regional Consolidation of Archaeological Collections,
Preliminary Findings**

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DEPARTMENT OF THE ARMY
MISSISSIPPI VALLEY DIVISION, CORPS OF ENGINEERS
P.O. BOX 80
VICKSBURG, MISSISSIPPI 39181-0080

REPLY TO
ATTENTION OF:

CEMVD-DE

5 SEP '14

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: MVD Regional Consolidation of Archaeological Collections,
Preliminary Findings

1. In February 2014, the U.S. Army Corps of Engineers Mandatory Center of Expertise for the Curation and Management of Archaeological Collections (MCX CMAC) was directed to prepare a plan outlining a process for regional consolidation of MVD's archaeological collections. Through consultation with district staff and the current repositories, a component of the report will be an update on the extent of each district's collections.
2. One significant preliminary finding is that collections reported by both repositories and districts as Corps' responsibility may not be part of our stewardship responsibility under Federal law. Many of these collections resulted from reconnaissance studies, feasibility studies, preconstruction engineering and design studies, and projects pursued under the Continuing Authority Program (CAP). Because cultural resources compliance was completed by the Corps, the repository and the district often assumed that responsibility for permanent curation of generated collections rested with the Corps.
3. This memorandum is intended to reinforce the extent of cultural stewardship responsibility for MVD collections. For collections generated from non-Corps property during reconnaissance studies, feasibility studies, preconstruction engineering and design studies, and CAP projects, districts should not be taking long-term curation and fiscal responsibility once federal interest in the collection ends. That is, collections recovered from lands in which the Corps had no real property interest are the "property of the landowner," and the landowner should be "encouraged to arrange for permanent curation with collections management centers in a manner consistent with Federal curation requirements" (ER 1105-2-100, Appendix C). Although district staff may aid the property owner in arranging permanent curation for collections, the Corps is not responsible for permanent curation for this material.

CEMVD-DE


SUBJECT: MVD Regional Consolidation of Archaeological Collections,
Preliminary Findings

4. There may be a small volume of archaeological collections from non-Corps property that are not subject to ER 1105-2-110. In these instances, MCX CMAC will work with districts to determine the extent of Corps responsibility for permanent curation. Actions required to determine collection responsibility will extend past the end of the present study, currently on track to be finished by 31 December 2014. It is anticipated that operations, planning, contracting, and real estate staff will be required participants to accurately identify MVD collections. Such identification will ensure that we appropriately apply our resources in the future.

5. For current and future projects where the Corps interest in the land is less than fee, project and contracting documentation must clarify the responsible party for long-term curation, as well as outline the fiscal responsibility for any generated archaeological collections. In general, if the landowner is not the Corps, the responsible party should not be the Corps.

6. Additional preliminary findings also indicate that there is the capability, capacity, and desire to see MVD collections consolidated into fewer localities. You and your staff are urged to continue to communicate with MCX CMAC as they complete the study and to be ready to move forward in anticipation of MVD direction on actions to more effectively manage our collections.

7. The POC for this action is Michael "Sonny" Trimble, Chief, Mandatory Center of Expertise for Curations, 314-331-8466.



MICHAEL C. WEHR
Brigadier General (P), USA
Commanding

DISTRIBUTION:

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