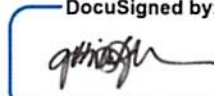


Museum Conservation Institute
Collections Management Policy
Shared Stewardship and Ethical Returns Amendment

This collections management policy amendment has been reviewed in accordance with SD 600 and the Smithsonian Shared Stewardship and Ethical Returns Policy.

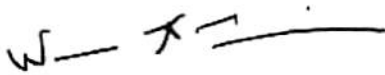
Have read and approve:

DocuSigned by:



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Jessica Johnson

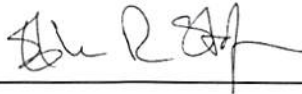
Acting Director, Museum Conservation Institute



William G. Tompkins
Director, National Collections Program



Craig Blackwell
Associate General Counsel



Ellen Stofan
Under Secretary for Science and Research



Lonnie G. Bunch III
Secretary

3/29/23

Date

Museum Conservation Institute

Shared Stewardship and Ethical Returns Policy Addendum

March 2023

Statement of Purpose

The Museum Conservation Institute (MCI) is committed to working respectfully with the communities from whom the Smithsonian's collections have originated. Requests and decisions regarding ethical returns are governed by this policy. MCI considers all requests for ethical returns and shared stewardship seriously and will review each request on a case-by-case basis. MCI recognizes museum collecting practices have evolved over time and that items may have been collected or acquired in ways that may not reflect our current ethical and professional standards.

MCI's mission is to increase and disseminate scientific knowledge that improves conservation of museum collections and related material and contributes to enhancement of their contextual interpretation. MCI also uses analytical techniques to elucidate the provenance, composition, and cultural context of museum collections and to improve the Smithsonian's conservation and collections storage capacity. This mission requires staff to work closely with objects from Smithsonian collecting units and external institutions and collect objects or samples for comparative study and analysis, including objects possibly eligible for potential return or shared stewardship based on ethical considerations.

The Smithsonian's [*Shared Stewardship and Ethical Returns Policy*](#), adopted on April 29, 2022, and the [*Smithsonian Shared Stewardship and Ethical Returns Statement of Values and Principles*](#) developed by the Ethical Returns Working Group reflects that ethical norms and best practices as they relate to collecting objects for museums have evolved over time. This Shared Stewardship and Ethical Returns Policy implements transparent, respectful, meaningful collaboration, and prompt response for all requests.

MCI welcomes requests and inquiries that augment or clarify ownership history of objects through its [website](#), where visitors are directed to send information or questions to MCIweb@si.edu. Requests and inquiries sent to this resource account related to ownership history, including requests for return based on ethical considerations, are sent by the museum's Information Officer to the Acquisition Committee (see "Authority and Responsibilities"). It is the Committee's responsibility to manage the research, documentation, and decision-making process and ensure a prompt response to requests and inquiries.

Applicability

The MCI Shared Stewardship and Ethical Returns Policy applies to all objects in MCI's collections and all related material, including information, research, data files, scans, and images. If a request is sent to MCI about an object titled to another SI Unit or institution, that request will be referred to the titled institution for resolution. If the request includes information, research, data files, scans, and images generated by MCI, it will engage in collaborative discussions with the Unit or Institution and the requestor to ensure full compliance as outlined in this policy.

For requests for the return of information, research, data files, scans, and images related to an object from another Smithsonian collecting unit or outside institution, MCI will consult with the requester and the titled institution.

If a conflict develops from MCI's Shared Stewardship and Ethical Returns Policy regarding the return or sharing of information, research, data files, scans, and images conducted on an object titled to another Smithsonian collecting unit, the other unit's policy may take precedence.

MCI is committed to thoroughly reviewing ownership history and researching ethical concerns prior to acquiring new material or disposing of material from its collection.

Authority and Responsibilities

All Shared Stewardship and Ethical Return requests will be entered into the [SI Shared Stewardship and Ethical Returns Tracking System](#) by the Information Officer. Additionally, the Information Officer is responsible for alerting the Registrar Designee(s) of all ethical return and shared stewardship requests who will then place them on the agenda for the next Acquisition Committee and produce an Acquisition Committee Referral Memo. The Information Officer and Registrar Designee(s) are responsible for identifying and inventorying all objects, research, information, data files, scans, and images related to the request for review by the Acquisitions Committee.

The Acquisition Committee will review all requests and make recommendations to the Director who has the authority to approve the Committee's decision. Smithsonian staff from other collecting units with object-specific expertise can be included in the Acquisition Committee meeting if necessary to understand the context of the object.

This process follows the same requirements as disposal of any collection objects per MCI's Collections Management Policy. The Committee is responsible for promptly evaluating, documenting, and decision-making processes for all requests concerning ethical returns. The Committee's decision must be unanimous, and each member of the Committee must sign the Acquisition Committee Referral Memo to confirm their decision.

Absent a request, if MCI staff have reason to believe that a collection object or information, research, data files, scans, and images raises ethical concerns under the Shared Stewardship and Ethical Returns Policy, staff should proactively research and present concerns to the Acquisition Committee in a prompt manner consistent with the policy.

Communications with the requester should be sent from the MCIweb@si.edu email account, signed by the Acquisition Committee. MCI's Director is responsible for relaying final decisions to requesters. Acknowledgement of the request should be completed within two (2) weeks of receipt. The review by the Acquisitions Committee should take place no later than two (2) months after the initial requests and a well-documented response should generally be provided to the requestor no later than three (3) months following the initial request. For complex requests that may take longer than three months, MCI will provide periodic updates to the requestor.

When a request is approved by the Acquisition Committee and Director, all information, including the decision process, must be submitted to the requestor. At this time, a timeframe for the return and a preferred format for returning information, research, data files, scans, and images will be confirmed. Before deaccessioning collections for ethical return, MCI must consult with the Under Secretary for Science and Research, the Office of General Counsel (OGC), and the National Collections Program (NCP), and must obtain all approvals for deaccessioning and returns required by SD 600.

If a request is denied by the Acquisition Committee or Director, prior to informing the requester, the Director must consult with the Under Secretary for Science and Research. All final denial decisions must be documented, and the Acquisition Committee must communicate the denial in writing to the requester with a brief statement of the justification or rationale for MCI's decision.

It is the Director, Deputy Director, and Group Heads' responsibility for implementing this Shared Stewardship and Ethical Return Policy in annual plans, strategic priorities, and Collections Stewardship plans.

Evaluation Criteria

The Acquisition Committee must first consider if the requester is the appropriate party to make a request based on the nature of the requester's relationship to the collection or collection item (descendant, governmental, cultural group, etc.).

The Acquisition Committee must evaluate if the request presents a suitable opportunity for shared stewardship or return based on ethical considerations such as:

- Circumstances of original acquisition
- Circumstances of SI (Smithsonian Institution) acquisition
- Evidence of original acquisition by force, under duress, through coercion, without consent, or involuntarily
- The ability to redress the harm or unethical circumstances of the acquisition through return or shared stewardship

MCI will not consider the value (artistic, research, historical, cultural, or monetary) of the object as part of its review; nor will the return be based on the requestor's ability to provide Smithsonian's standards of care.

In evaluating a request, MCI should consult with the requester, and may consult as appropriate with industry experts and other relevant parties. Decisions should be made based on the totality of facts and circumstances and the information presented.

For implementation and procedural information, see MCI Collection Procedure Manual's section on Shared Stewardship and Ethical Returns. The Procedure Manual will provide step-by-step instructions to ensure compliance with this policy.