

APPENDIX I:

PUBLIC COMMENTS

Lyons, Patrick D - (plyons)

From: Jill Heilman <JHeilman@azdot.gov>
Sent: Friday, February 10, 2017 1:07 PM
To: ASM-ratesandfees
Subject: new fees

I say do whatever you need to do to stay afloat!

Jill Heilman
Historic Preservation Specialist

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Lyons, Patrick D - (plyons)

From: Watson, James T - (watsonjt)
Sent: Wednesday, March 01, 2017 11:19 AM
To: Lyons, Patrick D - (plyons)
Subject: FW: fees and reports

Patrick,

I assume that you have a file that you are keeping e-mails from the ASM Fees Public Comment e-mail so I am forwarding this on to include in that file. Dave Stephan came in to verbally discuss his concerns about the fee changes, but then provided this concise recap of our discussion, so this can be added with the other comments that have been e-mailed in.

Thanks, jim

From: David Stephen [<mailto:dvms@pastarizona.com>]
Sent: Tuesday, February 28, 2017 3:08 PM
To: Watson, James T - (watsonjt)
Subject: fees and reports

Jim-

Thanks for taking the time to meet with me last week. To recapitulate, with respect to the ASM fee structure, because most of my clients are small private land owners, they are put off by the increase in fees for small survey projects. At present, to submit a survey report to ASM, the owner of 1 acre of land is being assessed the same fee as a company developing 200 acres. Since the start of AZSITE, the minimum fee for submitting a small survey project has gone from \$10 to \$150. For reference, it costs only \$14 to file a 10 page document with the county recorder but \$150 to file the same size document with ASM. The \$150 amount does not include a portion of the annual AZSITE fee that is paid by the archaeological firm and indirectly passed on to the client. As an aside, the AZSITE fees have gone up disproportionately for small archaeological firms (up 67%) compared to larger firms (up 20%).

As we discussed, these increased costs provide little incentive for private land owners to voluntarily file reports with ASM thereby diminishing the comprehensiveness of the archaeological record housed at ASM. Part of the original intent of developing a comprehensive data base was for it to serve as a resource for research and scholarship. My sense is that ASM/AZSITE rather than promoting scientific investigation has moved toward putting the emphasis not on science but on compliance with regulations.

~~The other matter we discussed was my agreement with Beth, when she was director, to submit reports for older projects that had not been brought to completion but have site or accession numbers assigned to them. Rather than just turn back the site/accession numbers, my preference is to have the information archived at ASM. She supported my efforts and agreed to waive the fees for projects dating to 2011 and before. As the acting director, I wanted to make sure that you concurred with this approach. I have, and will continue to pay the fees for projects initiated after 2011.~~

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~~FYI, I have two concurrent ASM permits. I hold one permit through Pima College and my ongoing role as a PI and Director Emeritus at the Archaeology Centre. The second permit is issued to my consulting firm (P.A.S.T.) with me as the P.I.. The reports will be submitted from P.A.S.T.~~

Thank you very much.

Dave

--

David Stephen, PhD

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Sustainability ~ Conservation ~ Historic Preservation

March 9, 2017

Dr. Patrick Lyons, Director
Arizona State Museum
University of Arizona
PO Box 210026
Tucson, AZ 85721-0026

Re: Notice of Intent by the Arizona State Museum to Increase Fees for Services

Dear Dr. Lyons:

As a directly affected political subdivision of the State subject to the Arizona Antiquities Act, ARS Title 41, Chapter 4.1, Article 4 and § 41-865, Pima County provides the following comments regarding the proposed increased fees for services provided by the Arizona State Museum (ASM) in accordance with ARS § 15-1631 (as amended). Moreover, while Pima County only submits these comments on its own behalf, I note that all political subdivisions of the state – all municipalities, counties, school districts, irrigation districts, flood control districts, improvement districts and similar entities with tax levy authority that are subject to the State Antiquities Act will be similarly impacted.

1. Broad Impact – The public notice notes, “*There is no anticipated fiscal impact to the state General Fund associated with this legislation.*” However, the proposed fee structure passes what should be state costs down to local government. The proposed increased fees for services does not just apply to the State Land Department and State agencies. These fee increases will negatively affect Pima County and other political subdivisions of the state adding significant new costs, especially for curation (400% increase), to limited project budgets funded by local government.
2. Cost Shift – The proposed fee schedule apparently fixes the initial complaint of excessive project registration fees, but shift the costs to curation and issuance of project specific burial agreements. While project efforts and costs often reflect a ratio of about 1:1 for fieldwork compared to analyses, report, and curation, the proposed cost increases are likely to result in a cost shift approaching 1:3. To bring these efforts more in balance as it is now, Pima County will be forced to seriously consider less excavation and data recovery and less analysis in order to accommodate higher curation costs in a fixed project budget.
3. Unintended Consequences - While some state agencies and political subdivisions of the state are fully compliant with the State Antiquities Act, others are not, and no penalties are ever assessed by the Arizona State Museum for non-compliance. Compliant agencies and political subdivisions of the state will in effect be “punished” for their compliance and bear a significant additional cost burden for observing state law. The unintended consequence is that prohibitive cost increases for curation are likely to result in less compliance statewide as the political will from elected officials and others to observe the Antiquities Act is lost. These officials are responsible to the taxpayers they serve. It will simply become too costly to conduct the necessary archaeological investigations and curation required under the Antiquities Act, resulting in a consequential loss of the archaeological record.
4. Discrepancy in Rules regarding Collection and Curation of Artifacts and Records – Archaeological data recovery projects undertaken by local government and political subdivisions of the state are required under the ASM repository manual to curate 100% of artifacts collected, unless the

Director of the ASM allows certain categories of material to be culled. Standards for federal or private lands are not so prescribed, resulting in disparate treatment of archaeological sites, data, and materials.

5. Culling and Disposal - To avoid prohibitive curation fees as proposed in the new ASM fee schedule, field labs to conduct in-field analyses and on-site culling and disposal should be considered through sound scientific rationale and methods presented in the required research design and treatment plan that is approved by ASM through its Permit issuance process. It is recommended that ASM issue stricter and clearer scope of collection statements in the event that 100% of the identified collection cannot be curated due to budgetary limitations. The proposed fee schedule implementation should be delayed until such an in-field analysis, on-site culling, and disposal option can also be implemented.
6. Reduced Sampling to Reduce Curation Collections – If field labs, analyses, and culling are not allowed, it will be necessary for Pima County and others to reduce project scopes of work and data recovery sample size and analyses, resulting in less information obtained from archaeological sites before they are lost to development. This approach does not serve the archaeological record well, but it would be effective in reducing project curation costs, which Pima County will be forced to seriously consider under the proposed fee schedule. While it has been a longtime policy for ASM to segregate boxes of collected materials by project, the significant increase in the per box rate significantly impacts small scale projects that result in a small collection that does not take up a full box. It is therefore recommended that ASM begin to combine project collections in one box, as this has the added benefit of alleviating storage space issues, or charge partial fees for smaller boxes and collections. .
7. Budgetary Uncertainty – Moving from a task-based fee for service structure to one based on staff time adds significant uncertainty to local government and other political subdivisions of the state attempting to stay within contractual obligations. In the event that costs exceed what has been budgeted will result in reducing scope as noted elsewhere. When project budgets and project schedules are fixed, the only option is to modify project scope including lowering the sample fraction of features excavated, artifacts and samples analyzed, and culling recovered collections.

Furthermore, the proposal does not adequately define how the new rate structure will be uniformly applied to projects of similar scale. For instance, in the example table the Project Registration for Monitoring Project (curated at ASM) has a cost of \$1,079, however, under a time-based fee structure, a monitoring project of identical complexity may cost more or less depending on how much time an individual bills to that project. A more formal description of cost control measures is warranted.

8. Other Curation facilities – While finding other curation facilities in the state to take collections from Pima County may not be possible, the proposed fees will in effect serve to drive business and curation of local site records and collections away from ASM. This does not facilitate good future collections research that should be easily accessible.

ASM's proposed curation fees are not consistent with the fee structures of other regional, federally-accredited curation facilities:

Current Curation Rates in nearby states:

- Nevada (Las Vegas Museum of Natural History): \$450 per cubic foot for artifacts
- Utah (Utah Museum of Natural History): \$565.29 per cubic foot for artifacts, \$188.43 for 5-inch clamshell
- New Mexico (Museum of Indian Art and Culture, Laboratory of Anthropology): \$525 per cubic foot with a sliding fee scale for ½ cubic foot, ¼ cubic foot, 1/8 cubic foot, and \$525.00 per cubic foot for documents with sliding scale for one linear inch.

While the state of Arizona may not be funding ASM adequately compared to these other states, an explanation of this drastic disparity in costs is warranted. Additionally, the ASM proposed rate structure for curation should consider a sliding scale for artifact and document curation.

9. Curation for Field Schools - It is unclear how collections from field schools and other academic research will be treated, or whether these collections will be subject to the same costs and fee schedule, or perhaps none at all. If reduced fees or no fees are assessed for field school projects and other research, it is unfair for all other entities to subsidize the processing and treatment of these collections. If there are different rate schedules for academic research and projects, I would ask that local government and political subdivisions of the state be subject to a "government rate."
10. Consultation with Tribes – It is unclear whether tribal nations were consulted in the setting of the proposed increased fees or whether any discussion ensued regarding the unintended consequences of this decision. Has ASM ascertained what tribes think if local governments and political subdivisions of the state stop complying with the Antiquities Act? Or, if the sample of the archaeological record is at a much lower fraction than is currently the case? Or, if archaeologists rebury artifacts in the field in order to lower curation costs? Some Tribes have, in the past, expressed some interest in reburying archaeological collections rather than curating them. Is this an idea that ASM is now supporting?

To conclude, Pima County feels it has striven to be exceptionally compliant with the State Antiquities Act for at least 30 years. Not only has the County required cultural resources inventory, evaluation, and treatment for its own projects since that time, it also requires the same level of treatment of archaeological sites from private developers in unincorporated Pima County. These policies have resulted in approximately 6,500 projects, resulting in significant contributions for local, regional, state and national, and even international research.

I am certain most counties, municipalities, and other political subdivisions of the state do not come close to this number of projects and level of compliance. While Pima County certainly takes pride in its policies and practice to ensure that the appropriate level of treatment and data recovery of archaeological sites is completed prior to development by the public or private sectors, I am not certain we can continue to maintain the same high treatment standards with the proposed fee increases.

Laws 2016, Chapter 166, amends ARS § 15-1631 to require that rates for fee increases for mandated cultural resource management services performed by ASM be proposed by ASM and then adopted by the Board of Regents. We also understand there is nothing in the statute that compels the Arizona State Museum or Board of Regents to amend this fee proposal. However, we do believe that more consideration needs to be given to the likely consequences of the proposed fee increases before these increases are enacted. If you would like to discuss this further, please do not hesitate to contact me.

Sincerely,



Linda Mayro, Director
Sustainability, Conservation, Historic Preservation

Cc: James Watson, ASM Associate Director
Roger Anyon, Program Manager
Courtney Rose, Program Manager
Ian Milliken, Program Coordinator



Doug Ducey
Governor

ARIZONA STATE PARKS & TRAILS

Celebrating 60 Years!

Sue Black
Executive Director



March 10, 2017

Patrick Lyons
Director
Arizona State Museum
1013 East University Boulevard
PO Box 210026
Tucson, Arizona 85721-0026

RE: Notice of Public Information Regarding Intent and Proposal to Increase Rates and Fees for Cultural Resource Management Services Performed by Arizona State Museum
(*Published by the Arizona Secretary of State, Vol. 23:6; February 10, 2017*)

Dear Dr. Lyons:

As you are aware, the Governor's Archaeology Advisory Commission advises the SHPO on issues of importance regarding the state of archaeology in Arizona. The published Notice of Intent and Proposal to Increase Rates for Cultural Resource Management Services performed by ASM was of concern to the Commission. The Public Policy Committee of the Governor's Archaeology Advisory Commission has reviewed the above referenced information, and provided their comments and concerns in their meeting notes from March 1, 2017 (see attached). Given the short review period, the Commissioners did not feel that they could draft a response letter within the requested comment period deadline.

The Arizona SHPO appreciates the current funding situation which has created the need for rate and fee increases for the Cultural Resource Management Services for Arizona State Museum and supports ASM's efforts to achieve a financing structure that will enable the Museum to sustain its operations and provide these important services to the State. Please let me know if there is anything that our office can do to assist the Museum in raising the awareness of the important role curation plays in preservation of Arizona's archaeological heritage.

Sincerely,

Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office

GAAC Public Policy and Professional Competency Subcommittee Meeting/Teleconference Minutes

March 1, 2017 10:00-11:30am

Attendees:

Ruth Greenspan (RG) – Subcommittee Chair
Tom Wilson (TW) – GAAC Chair
Ian Milliken (IM) – GAAC Member
Jim Cogswell (JC) – SHPO Representative
Mary-Ellen Walsh (MW) – SHPO Representative
Lauren Jelinek (LJ) – Subcommittee Member

The meeting was called to order by RG, who is chair of the Public Policy Subcommittee for GAAC. Members of the Public Policy Subcommittee (RG and IM) had previously met to discuss a possible GAAC comment on the proposed ASM fee structure on February 17, 2017. IM reviewed some of the questions they raised during the February 17 meeting:

1. One of the consequences of moving from a task based fee structure to one based on time is that most agencies/companies have no way to pay for fees incurred that exceed the budget after project inception. For most projects there is no way to obtain additional funding by the time curation is started because the construction of the project has been completed and closed out. How does ASM propose to address this issue with the initial budget and repository agreement?
 - a. IM examined the standard ASM repository agreement and noted that there is no clause stating what happens to the collection or the agreement in the event that there are insufficient funds to curate the entire collection.
 - b. A possible solution for addressing rising curation costs would be stricter and clearer scope of collection statements both from ASM and the entity contracting the work to ensure only those materials that should be curated are processed, packaged, and submitted to ASM for curation.
 - c. Such an approach would require clearer policies and standard operating procedures for infield analysis of those objects that won't be curated and well as specifications of how those objects will be treated following analysis (i.e. discarded, reburied, etc.)
 - d. RG recommended that this would also be an appropriate discussion for the curation study that the Public Policy Subcommittee is undertaking.
 - i. MW stated that Pueblo Grande has a debitage culling policy that the subcommittee could request as an example.
2. The language in the fee schedule implies that some of the fees have increased to accommodate ASM staff time to bring sub-par collections up to ASM standards. Aren't there ways to accomplish this other than by increasing fees?
 - a. If that is the motivation for increasing specific fees, couldn't ASM simply reject the collection upon submission until it has been properly prepared?
 - b. IM reiterated that preparing the collections to meet ASM standards should be the responsibility of the contractor or the agency and ASM should decline to accept it because it is a violation of the repository agreement.
 - c. LJ suggested that ASM consider adding a clause that gives them so many days per a specified number of boxes to examine the collection. If it is found to be deficient, they reserve the right to return the collection to the preparer until the preparer resolves the deficiencies.

3. IM also recommended that ASM consider comingling small projects within a box to save money and address space issues.
 - a. If a linear foot and a single box is the smallest unit of measurement for a project, many companies and agencies will be expected to pay fees for space they don't need.
4. A question was raised about redundancy between State Archives and ASM. Are agencies required to submit copies of reports to both entities?
 - a. JC clarified that ASM does not curate anything with State Archives.
5. IM recommended ASM consider going purely digital for traditionally paper archives such as reports and photos.
 - a. LJ stated that there is significant disagreement within the field about the longevity of digitally-born data, the ability of a repository to continuously update digital records without degrading them so that they can be read by current software, and the funds necessary to store and maintain the equipment to house them. Given that ASM must be financially independent, the cost of setting up such a system would be prohibitive.
6. The proposed fee structure doesn't provided sufficient clarification on which entity within ASM is receiving the funds. The fee structure should be clearer about the roles of ASM, ARO, and AZSITE and which entity will receive which fees.

TW asked for clarification on the larger role of GAAC in these discussions. RG clarified that if GAAC better understood the issues behind these fees and how they will be used, we could provide a more clear response to the fee structure. IM reminded the subcommittee that comments were due by March 12, 2017. TW stated that GAAC may want to send ASM notes or questions rather than a statement, given the timeframe, and asked SHPO how best to deliver these questions. SHPO agreed to confer and ask how best to transmit notes/questions rather than a formal comment.

7. IM also asked about the substantial increase in the burial agreements. He suggested that ASM clarify when a general burial agreement is used rather than a project-specific burial agreement.
 - a. LJ asked if ASM was able to enter into PAs and if so, wouldn't it be more cost-effective in the long run to put a general agreement into a PA format so they would cut down on staff effort?
 - b. Also questions were raised about whether the entity funding the project has any say in the clauses introduced in the general or project-specific burial agreements. This should be clarified.
8. IM also asked how a system that is moving from a fee based to a rate based structure could be uniformly applied.
 - a. Different staff members will take variable amounts of time to perform the same task. What assurance do contractors have that the appropriate person is performing the task at the appropriate rate (i.e. paying a Curator to do the job of a student employee)?
9. There are additional concerns about how to budget for this kind of fee structure. It is difficult enough for consultants to estimate the costs associated with testing and data recovery when they have not even put a shovel in the ground, but to estimate the total cost of curation in advance and then provide ASM with a 15% down payment before investigations have even begun, is equally problematic.
 - a. IM asked who prepared the estimates: ASM or the contractor? Are there any kinds of negotiations?
 - b. LJ suggested that a guide emailing how ASM envisioned this would work (i.e. process) would go a long way to addressing these questions.

Three members had to leave so the remaining members agreed to adjourn and transmit the notes to SHPO for eventual transmittal to ASM.



DESERT ARCHAEOLOGY, INC.

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Sarah Herr, Ph.D.
President

William H. Doelle, Ph.D.
Vice President

March 10, 2017

Dear Dr. Lyons,

Thank you for the opportunity for Desert Archaeology to provide comments on the "Draft Proposal to Increase Rates and Fees." The rates and fees that are addressed are those for mandated programs related to cultural resource management services, including the registration of projects, the curation of archaeological collections and records, the development of burial agreements, and the recovery and analysis of human remains. Desert Archaeology has been a cultural resource management (CRM) firm headquartered in Tucson since 1982. Our company, a small, privately-owned business, works for government and private clients to provide the archaeological services required within the environmental compliance process. As the provider of a number of services that are mandated by preservation legislation, Arizona State Museum (ASM) plays an essential role in these processes in Arizona, and our company, like all CRM companies, serves as a middle player between our clients conducting development projects and the ASM. As such we work closely with the museum, and over the past 25 years we have paid over \$2.3 million in curation fees. We consider ourselves stakeholders in the ASM's success.

The governments of multiple jurisdictions have recognized the value of heritage for the quality of life in America and, as such, have put regulations in place that require information about the past be recovered from a project site before development. After archaeological investigations and development, all that remains of the archaeology in the path of construction is the artifact collections and samples and the documentation of their removal. As such, curation of these materials plays a critical role in preserving archaeological data and knowledge of the past.

Due to many factors - the intersection of federal and local preservation laws that require consideration of historic properties in advance of development projects, the scale of economic development in southern Arizona, ASM's designation as the state's repository, and the number and scale of archaeological resources in Arizona - the ASM is one of the busiest repositories in the United States. It, like many other repositories, is in the midst of a curation crisis. In the four decades during which this crisis has been recognized, problem solving has often been short term. With this proposal, ASM is taking a longer view in making changes both to the rates and the process of recovering costs in order to create a more sustainable curation situation. However, they have not addressed likely devastating consequences to large segments of the business community and to the Arizona public. Even as the current proposal notes that it will directly benefit "project sponsors and the people of Arizona, including the state's tribal communities" it is a narrow document that serves the very real needs of the museum and the university, and a small proportion of project sponsors but not the larger CRM community. This proposal demonstrates a lack of understanding of the business of cultural resource management practices outside the ASM, and presents challenges to our ethics as archaeologists and business people even as it puts an undue burden on our companies. It might be argued that the CRM community

benefits by the presence of a statewide repository that allows us to meet legal regulations and professional ethics, but a facility that uses this proposed rate and fee structure does as much to endanger our businesses as it does to support them. The premise that the proposal will be more “transparent, consistent, and scalable to the differing scopes of various projects,” while desirable, is more successful in some of these areas than others. As such, Desert Archaeology provides comments on two key areas, the process of cost recovery related to curation and the substantive increase of fees in some areas. We also question the premise that state support of ASM mandated services is an improper use of state funds allocated for educational purposes.

Cost Recovery Process

The rates and fees that ASM has proposed are based on the actual time it takes for their specialized and professional staff to perform activities related to the registration and curation of archaeological projects, and it includes ‘in perpetuity’ costs that are not assessed until the collections are turned over for curation. There is no provision for consistency from one staff person or project to the next, and the costs are not knowable until after they are incurred. Further, ASM proposes to bill our companies monthly for up to five years after our collections are delivered at the end of the project. This lack of predictability and timeliness is untenable for our business.

We work in a competitive industry where companies compete with each other based on technical skills and cost, and our government clients often demand very low-cost budgets. As such, our budgets are often set at the beginning of an archaeological project, providing our client with a knowable cost within their own larger development project. The report review and the curation services come at the end of projects. Our clients do not write us blank checks, and committing to an indefinite amount over an extended period of time for repository and mandated CRM services is unlikely to be acceptable to them. Previous ASM fee structures have had costs that are easily estimated, such as field person-days, acres surveyed, or per-box or linear feet of collections, and there was a commitment that the fees current at the time of repository agreement would apply at the end. Now we are being asked to obtain non-binding cost estimates at the beginning of projects without any accountability for the final costs. In an era when streamlining is critical to environmental compliance, why implement a process that is more bureaucratic and adds an unacceptable level of uncertainty?

Because the environmental compliance industry is seen by some clients as a bureaucratic obstacle, the best chance of getting funded for project costs is at the point when our services are still part of the critical path. In our current practice, we write our curation costs into our budgets so clients are obligated at the beginning of the project. After we provide our compliance services and the client has the legal permission to move forward with their development, we have far less leverage, beyond invoking ethical archaeological practices, with which to obtain additional funds. If real curation costs are not planned and budgeted at the very beginning of a project there is a far greater chance that they will be orphaned (See: *A Checklist for Sustainable Management of Archaeological Collections*” by S. Terry Childs and

Danielle M. Benden (<https://doi.org/10.1017/aap.2016.4>). The lack of transparency puts our companies at considerable risk for holding collections for which curation is not funded.

In the United States, archaeological collections are owned by the land owner. Government land managing agencies are required to curate artifacts in federally approved repositories, such as ASM. Many private landowners will curate artifacts collected from development projects as a matter of ethics, but it is not legally required. Our standard practice is to ask those stakeholders for a Deed of Gift at the beginning of the project, and include the curation costs in the project budget at that time. With the reduced transparency and higher costs, we expect curation of privately-owned collections to become more challenging and potentially detrimental to the field of archaeology as a whole.

Cost Increases

The scale and immediacy of the cost increases, particularly the fees for the curation of artifacts, estimated at \$4,325 in 2017, and the related paperwork, estimated at \$2,577 in 2017, have enormous ramifications for CRM businesses and their clients. In 2005, the ASM changed its rate structure from calculations based on field person-days to the per-box rate of \$350. Between 2007 and 2014, the per-box rate increased about 5% per year. Thereafter, it jumped by 30 percent. Project registration fees have increased even more rapidly. These increases have caused substantial reverberations within the CRM industry, and business like ours have done our best to justify and explain them to our clients. However, with the proposed increase and additional 'in perpetuity' charge, the per-box rate is estimated to jump more than 400 percent above what are already very large numbers. No industry can support essential costs rising at this level.

Year	Per box	Project Registration
2005	\$350	\$225
2006	\$350	\$225
2007	\$565	\$225
2008	\$593	\$225
2009	\$623	\$2,000
2010	\$654	\$3,000
2011	\$687	\$3,000
2012	\$720	\$3,000
2013	\$750	\$3,000
2014	\$750	\$3,000
2015	\$1,000	\$3,000
2016	\$1,000	\$6,000
2017	\$4,300	

The disproportionate costs of mandated services relative to the scale of small projects created consternation among project sponsors working for utility companies and led to the SB 1418 regulations. While the new proposal examines the scalability of fee structure to address some problematic rate increases, it is primarily responsive to those who sponsor monitoring and testing projects. The burden on the sponsors of other types of projects (including sponsors such as the Arizona Department of Transportation) will be tremendous. The cost of curation for CRM businesses includes both the box fees that are the subject of this Proposal, and the labor resources required to prepare collections to ASM standards before the materials are transferred. Since 2005, curation costs on Desert Archaeology projects have ranged from approximately 3 to 18 percent of a project's total budget. Relative to field efforts, curation costs range from one-quarter of the cost of the field effort to twice as much as the field effort, with the relative cost of the curation for small projects generally higher than that for large projects. A quadrupling of curation costs sets a value on curation that is disproportionate to other requirements archaeological compliance projects, particularly small projects, need to fulfill.

While we are not fully convinced of the ASM's cost calculations for in-perpetuity curation of a box of artifacts, especially when the much lower fees charged for curation in other southwestern states are considered, we use those costs to provide an example of how increased costs could be phased in. As background, between 2007 and 2017 (projected for 2017) the United States annual rate of inflation averaged only 1.8 percent. The average rate of increase in the per-box charge for artifact curation at ASM, however, comes to an annual rate of 41.8 percent. That is nearly 23 times the rate of inflation. So, what if a still very high rate of annual increase—20 percent—were to be applied over a span of eight years in order to bring cost recovery into line with ASM's projected in-perpetuity cost?

This example of a gradual fee increase provides an explicit way to think about this process:

- ASM increases its 2016 per-box fee of \$1,000 per box by a consistent and predictable (and still very large) 20 percent per year through 2025.
- This more gradually brings the per-box rate to \$5,160 in 2025.
- If an annual 2-percent inflation multiplier is applied between 2017 and 2025 to the ASM's calculated per box cost of \$4,350 per box, that results in a fee of \$5,200 in 2025.
- This example would bring costs in line with ASM's projections by 2025, and thereafter the rate of increase in fees per box could be indexed to inflation annually.

One often heard critique of tax-payer funded archaeology is "all they do is dig up artifacts and put them in boxes in museums. Where is the public benefit in that?" As a service industry, considering how project dollars can benefit the public is a fundamental component of the way many CRM companies plan and implement projects. How can we support a massive cost increase that reinforces, and in fact gives credence to, unfavorable public perceptions of our practices?

Moving Towards Sustainable Curation Practices

The curation problem has been known since the 1970s when Dr. Raymond H. Thompson, writing about museum ethics, commented on the need for fair, impartial and consistent pricing for accessioning and curating collections. In 2006 the Governors Archaeological Advisory Commission (GAAC) subcommittee, chaired by Dr. Patrick Lyons, provided a history and an assessment of the situation (https://d2umhuunwbec1r.cloudfront.net/gallery/asp-archive/committees/downloads/GAAC_Curation_Crisis_Full.pdf). Some of the solutions identified in the GAAC report have been tried with varying degrees of effectiveness, others were not. Given the long term nature of the problem, the differential success of past solutions, and the current proposal's attempt to completely revamp costs and processes that are as new to the Arizona State Museum staff as they are to the rest of the CRM industry, we suggest a phased, multi-year approach to implementation. A longer period of inception will allow the ASM to evaluate and refine its procedures in ways that allow them to implement cost reducing best practices and set true rates for services rendered. A phased approach will also allow more time for a response from the marketplace as stakeholders assess the monetary values of scientific, legal, and ethical impetuses to curate archaeological materials. Ideally, it would also allow responses from other curation facilities within the state. A more gradual response to the increase of rates and fees will also allow CRM companies time to work with ASM to identify cost-saving practices on both sides.

By way of example, some key areas in which the ASM and CRM businesses should work together in advance of the full implementation of this rate and fee structure include:

- developing guidelines for digital documentation of artifacts
- developing guidelines for culling collections prior to curation
- developing cost-saving measures in the ASM curation protocols through better use of databases and other digital tools
- move from paper to digital records (after all, Arizona is home to tDAR, a model program of nationwide repute that promotes best digital archiving practices for archaeology)
- consideration of the expenditure of tax payer dollars
- approaching repository practices in a way that ensures that a greater proportion of project expenditures is on aspects of archaeology that deliver on the promise of promoting heritage in ways that increase the quality of life for Americans.

We also suggest that the university reconsider the use of funds allocated for educational purposes. The ASM has commented that they will change their current practices, and use only professional staff to perform the mandated services that are the subject of this Proposal. As a repository situated on a university campus, why not use students? Students working with collections will gain valuable technical experience in archaeology, compliance industries, and data management, regardless of what careers they pursue.

As it is, the cultural resources management sector is closely connected with the educational mission of the University and the ASM. For example, Desert Archaeology has had five employees who combined contract-funded research with their educational program and completed doctoral dissertations. Several

others were supported by contract projects while they wrote dissertations on unrelated topics, allowing the university's graduate student funding to go to others. And now that the University of Arizona School of Anthropology has an applied program that includes archaeology, many of the Master's candidates are using contract-funded projects as source material for theses and to arrange internships. These relationships often lead directly to jobs upon graduation. Finally, there is a very significant contribution by the senior staff at contract-funded institutions when they provide guest lectures for many different university classes. These are partnership relationships and they are done on a voluntary basis. These are just a few of the many mutually beneficial ties between the private and the educational sectors that have developed over the past several decades.

The curation crisis is a significant problem for the CRM industry and archaeologists in all their professional settings in Arizona and nationwide. It is not a problem for ASM alone, or even museums alone, although we recognize that ASM is underfunded by the Arizona legislature and the university. The ASM and University of Arizona proposal for rate and fee increases attempts to address the cost concerns raised by the sponsors of certain kinds of projects in spring 2016, but it proposes a plan too narrow in its interests, insensitive to the businesses it will require to implement it, and too costly for other types of project sponsors. The cost recovery process, scale of fees, and timetable for implementation are not viable for the industry. Desert Archaeology has more than 35 years of experience in private sector CRM and working together with ASM. We will support the ASM's efforts to identify a solution that considers ASM's mandates, CRM practices, and public benefits and values more holistically, such that a truly sustainable solution to curation concerns in Arizona can be developed.

Sincerely,

A handwritten signature in black ink that reads "Sarah Herr". The signature is written in a cursive, flowing style.

Sarah Herr



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March 10, 2017

Dr. Patrick Lyons, Director
Arizona State Museum
University of Arizona
P.O. Box 210026
Tucson, Arizona 85721-0026

Re: Arizona State Museum Proposed Increase in Rates and Fees for Cultural Resource Services

Dear Dr. Lyons:

SWCA Environmental Consultants (SWCA) has been providing cultural resources management services to a wide range of project proponents in Arizona for more than 30 years. We recognize the ASM's responsibility to provide mandated services pursuant to the Arizona Antiquities Act, which are necessary for us to fulfill our responsibilities to our clients. In accordance with Arizona Revised Statutes (ARS) §15-1631, as amended, we provide the following comments. We thank you in advance for considering our suggestions and feedback.

1. The current ASM fee structure is primarily task-based. The proposed change to a time-based rate structure introduces significant uncertainty to project costs for consulting companies like SWCA.
 - a. Our cost estimates for projects are commonly fixed-fee and proposed before a contract is awarded. It is important for firms like SWCA to be able to adequately and accurately account for the ASM fees in our project cost estimates; otherwise, we run the risk of there being insufficient funds to complete the curation/registration tasks.
 - b. Firms need to be able to provide project proponents with a detailed list of services and tasks to be performed by the ASM, the estimated cost per task, and a schedule for completing the tasks. The estimated costs must be readily determinable, consistently and uniformly applied, and substantiated.
 - c. For this model to work, the ASM cost estimate should be binding with assumptions. If assumptions are violated, then ASM would have recourse to pursue additional funds, but if ASM staff did not estimate or use their allotted time appropriately, the ASM should bear that burden, not firms like SWCA or proponents. This is how we do business and it works for our project proponents. We strongly urge the ASM to consider using this model.
2. The proposed rate and fee increase states that "project estimates are non-binding." We recommend, as previously stated, that ASM cost estimates really should be binding. Controls can be put in place for ASM accountability for time spent on review and processing. Invoices could be submitted with a description of services, including, at the minimum, 1) the task performed, 2) the date the task was performed, 3) the billing rate of the individual performing the task, and 4) the time billed to perform the task.
3. SWCA recommends that the ASM provide a timetable for which fees will be assessed, projects closed out, ASM work completed, and a final invoice submitted.
 - a. There should be a clear deadline by which ASM should have its registration and curatorial tasks completed, and the final invoice submitted.



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- b. The proposed rate and fee schedule only mentions that projects will be billed monthly, and that project estimates are non-binding. As proposed, ASM could, in theory, send monthly invoices for years after work is completed. Project proponents will have difficulty executing contracts with this level of uncertainty contained in the scope of work.
4. We strongly discourage ASM from charging for review of and commenting on document submissions. ASM should adopt and publish a “minimally adequate” standard and not request document edits when a state agency with the statutory authority to determine document adequacy has already done so. As the notice states, this burden is outside of ASM’s purview and well beyond the University’s authority and control.
5. The proposed in-perpetuity curation fees (\$3,004 per 1-cubic-foot box of artifacts; \$2,577 per linear foot of documents) are significantly higher than current fees or fees charges by other curatorial facilities. As many projects result in limited (i.e., 1 to 2 inches) documentation, we suggest that ASM consider a sliding scale based on the actual amount of space used. The fee of \$2,577 is very costly and not in line with smaller projects, such as for the curation of documents from a negative-finding monitoring or testing project. As proposed, project proponents could be paying for storage space that their projects do not use.

SWCA is very concerned about the unintended consequences of the proposed rate and fee increase, particularly for public-sector projects that have fixed budgets for environmental studies. We fear that the significant increase in curatorial fees will result in reduced field effort and less information gained through archaeological study. This unfortunate consequence could be countered by clear guidance on the culling and disposal of artifacts, particularly as it relates to projects conducted under an Arizona Antiquities Act permit.

Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in blue ink that reads "Cara Bellavia".

Cara Bellavia
Director, Phoenix and Tucson

A handwritten signature in blue ink that reads "Dan Garcia".

Dan Garcia
Cultural Resources Lead, Phoenix and Flagstaff

A handwritten signature in blue ink that reads "Jana Sterling".

Jana Sterling
Director, Flagstaff and Las Vegas

A handwritten signature in blue ink that reads "Jerome Hesse".

Jerome Hesse
Cultural Resources Lead, Tucson



Salt River
PIMA-MARICOPA INDIAN COMMUNITY
10005 EAST OSBORN ROAD SCOTTSDALE, ARIZONA 85256 PHONE 480-362-6337

Cultural Preservation Program

March 10, 2017

Director Patrick Lyons
Arizona State Museum
University of Arizona
PO Box 210026
Tucson, AZ 85721-0026

RE:

Dear Dr. Lyons,

The Salt River Pima-Maricopa Indian Community (SRP-MIC) is a federally recognized tribe with specific rights to consultation under Executive Order 2006-14 - Consultation and Cooperation with Arizona Tribes and as specified in ARS § 15-1631 (as amended). This letter is in response to the Arizona State Museum (ASM) Notice of Intent to Increase Fees for Services performed pursuant to ARS Title 41, Chapter 4.1, Article 4 and § 41-865. The Arizona State Museum has posted a Draft Proposal to Increase Fees for Services performed pursuant to ARS Title 41, Chapter 4.1, Article 4 and § 41-865 that will have impact on the SRP-MIC, therefore the SRP-MIC wishes to consult on this issue further.

The SRP-MIC was a part of informational presentations hosted by the ASM on two separate occasions to discuss curation fees associated with utility projects in the state, although these meetings were not government to government consultation. The discussions presented at the meetings SRP-MIC attended were focused on project artifact and documentation curation in perpetuity, and we were not aware there were changes to the fees regarding the burial discovery agreements. The SRP-MIC is very concerned with ensuring that proposed changes do not create a disincentive to private land owners to do archaeology or to enter into burial discovery agreements.

The SRP-MIC fully expects the Arizona State Museum to comply with the Executive Order 2006-14 - Consultation and Cooperation with Arizona Tribes and conduct government to government consultation with the tribes as necessary to fulfill statutory obligations, but more importantly in honor of the ASM and the Arizona Board of Regents' commitment to tribal consultation.

Thank you for your time and consideration in this request. Please contact me by phone at 480-362-6337 or via email at angela.garcia-lewis@srpmic-nsn.gov with questions or comments regarding this or any other cultural resource concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Angela D. Garcia-Lewis".

Angela D. Garcia-Lewis
Cultural Preservation Compliance Supervisor



March 11, 2017

Dr. Patrick Lyons, Director
Arizona State Museum
PO Box 210026
University of Arizona
Tucson, AZ 85721-0026

Dear Patrick,

I have reviewed the Arizona State Museum's (ASM's) "Draft Proposal to Increase Rates and Fees" and will provide several comments from the perspective of Archaeology Southwest. We are a nonprofit organization that practices Preservation Archaeology across the U.S. Southwest and Mexican Northwest. We do not engage in contract-funded cultural resources compliance work. We do conduct a field school in southwestern New Mexico in partnership with the University of Arizona's School of Anthropology, and we have undertaken several grant-funded research projects that have involved limited archaeological testing. We have also had a role in recovering several "orphaned collections" that were ultimately conveyed to the ASM. Thus, to a limited extent, we are a source of collections that are curated at the ASM.

Because Preservation Archaeology is an approach that tries to minimize the amount of new excavation, we often do make use of past collections that are already in museums. The ASM has been a very important source for access to key research collections. It is because of the long-term value of curated archaeological collections that Archaeology Southwest is a strong advocate for curation to be considered in the initial planning of any project that will involve new collections, whether surface collections or excavations.

With the above background, I will provide a set of comments on the ASM's proposed rates and fees.

1. **Inadequate State Support.** The starting point for my comments is a recognition that neither the state of Arizona nor the University of Arizona provide adequate support for the Arizona State Museum. The importance of the ASM's mission and the value of the remarkable collections held by ASM should be recognized through a significantly higher level of financial support for your institution.
2. **A Dramatic Increase in Curation Fees.** A basic concern with the proposed rates is that the magnitude of the sudden increase in per-box fees is going to have a very large impact on the way that archaeology is done in this state. I will address the following concerns in separate sections below: reduction of field effort, shifts to in-field analysis, culling of collections, curation in lower cost repositories, ignoring of compliance requirements, and a potential for a legislative backlash that weakens the Arizona Antiquities Act.
3. **Reduction of Field Effort.** There will be a strong pressure to keep overall costs of compliance activities down, and the most effective way to do that will be to have fewer artifacts and records to curate. The outcome of smaller field efforts will be a loss of valuable information and a slowing of the pace of research progress. Archaeology Southwest makes substantial use of



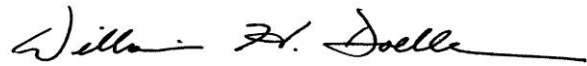
previous fieldwork conducted by others through compliance projects and has incorporated data from many such projects into our Heritage Southwest Database.

4. **Shift to In-Field Analyses.** A great deal of valuable information can be obtained from surface artifacts or from observations made on some classes of artifacts during field excavations. The quality of such information varies greatly depending on the skills of the observer. Furthermore, if the artifact or other material is not collected and curated, there can be no direct reassessment of those original observations. Archaeology Southwest has changed our planned research strategy on an upcoming research effort regarding Hohokam ballcourts. When these curation fees were first announced, we decided not to pursue limited test excavations at ballcourt sites. Instead we will make in-field surface observations and limited surface collections as the field method. Thus, even before they are in place, these proposed changes are affecting behaviors.
5. **Culling of Collections.** There is a great need for explicit criteria for culling collections. To not address this issue, or to assert that all collections must be curated once they are made, is not an acceptable approach for ASM to take. As archaeologists, we are always sampling when we deal with the archaeological record. Thus, other than basic counts, CRM firms often exclude from detailed analyses artifacts that are from temporally mixed contexts. Are there ethical ways to cull all or portions of such materials from collections after preliminary analyses have shown them to have less information value than unmixed collections? If such questions aren't addressed and some sort of professional consensus isn't reached, then it is almost a certainty that there will be "behind the scenes" culling in order to reduce box counts and control costs. Coming up with explicit best practices, will save on future curation space needs, reduce the costs of archaeological excavations, and would help ensure that sampling procedures applied to curated collections are accurately documented.
6. **Use of Lower-Cost Repositories.** Curation fees in nearby states are much lower than ASM's proposed per-box fees. Some other in-state repositories are also less expensive. These new fees are of sufficient magnitude that there will be a strong incentive to curate at other repositories than ASM. For Archaeology Southwest, that could well make our use of existing collections much more difficult to implement in the future. Collections may be located in repositories that are distant from where they were originally recovered or collections from the same site may end up at multiple facilities.
7. **Ignoring of Compliance Requirements.** There is already a fairly large number of subdivisions of the state that ignore their responsibilities under the Arizona Antiquities Act. The proposed very large fee increases will provide a justification (or rationalization) of why a governmental entity might choose to start ignoring its legal responsibilities or to continue ignoring them.
8. **Legislative Backlash.** In this era of streamlining of regulations and compliance processes, there may well be enough of a "sticker shock" once these fees start to be implemented that there will be complaints to the legislature for redress. The outcome could weaken the Arizona Antiquities Act, which would certainly be a very unfortunate outcome for the state, its citizens, tribes, the CRM community, nonprofits like Archaeology Southwest, and the ASM.
9. **Unpredictable Costs.** The proposed billing process where ASM does not provide any certainty regarding costs is particularly disruptive. CRM firms and nonprofits have different budget processes, but all are constrained by budgets that are finite, not open-ended.

These are concerns that I see from the perspective of a nonprofit organization that views itself as a long-term advocate for and partner with the Arizona State Museum. ASM should definitely be charging fees for curation services. However, these are very large fee increases, and they follow upon a preceding eight years of multiple large fee increases. If implemented, the impact on CRM, nonprofit research, and even the willingness of some state agencies to comply is simply too great. A gradual increase of fees

with a clear projection of those increases on a decadal time scale should be considered. And ASM has to come up with a way to provide responsible cost estimates that will be firm prices, not open-ended billing accounts with multi-year time frames.

Sincerely,

A handwritten signature in black ink, reading "William H. Doelle". The signature is fluid and cursive, with a long horizontal stroke at the end.

William H. Doelle, Ph.D.
President and CEO





THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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March 11, 2017

Dr. Patrick Lyons, Director
Arizona State Museum
University of Arizona
PO Box 210026
Tucson, AZ 85721-0026

RE: Comments on "Notice of Intent to Increase Rates and Fees for Cultural Resource Management Services Performed by the Arizona State Museum"

Dear Dr. Lyons:

The Arizona Game and Fish Department (AGFD) appreciates the opportunity to review the Arizona State Museum's (ASM) recent proposal to increase rates and fees, and offers the following comments for your consideration. Our agency would be directly affected by any proposed changes as both our internal Contracts Branch as well as the various archaeological consultants we utilize would be responsible for paying any rates and fees. AGFD is concerned that the proposal does not appear to clearly explain or justify the proposed changes.

General Comments

The original email notification sent from ASM on February 10, 2017, is confusing. It refers to a "Draft Proposal to Increase Fees for Services," but provides no link to an actual document, nor does it provide the document as an attachment. AGFD suggests that future notices should provide a clear path to finding the specific document being noticed. A search of ASM's website produced a page entitled "Notice of Intent to Raise Fees and Services." This page contains a link entitled "Draft Proposal to Increase Fees for Services." Clicking this link opens a document with no title page—the first page is a Table of Contents which at the top says "Notice of Intent and Proposal to Increase Rates and Fees for Cultural Resource Management Services performed (sic) by the Arizona State Museum" (page 2). This is confusing, unclear, and inconsistent. It is difficult to ascertain whether or not the correct document is being reviewed. Inconsistent language throughout the document also contributes to the confusion. For example, the headings are inconsistent in their use of the terms "proposal" vs. "notice of intent. The various headings are also problematic as they are not consistent in their reference to "fees," or "rates and fees." It would clarify the purpose of the document if language is consistent throughout. In particular, it would be helpful to clearly define the difference between rates and fees within the document.

The document deviates from the requirements outlined in the revised statute, which states:

THE NOTICE OF INTENT MUST:

1. INCLUDE A JUSTIFICATION FOR THE FEE INCREASE, WHICH SHALL CONTAIN:

(a) THE AMOUNT OF THE PROPOSED FEE INCREASE.

(b) A LIST OF THE PERSONS WHO WILL BE DIRECTLY AFFECTED BY, BEAR THE COSTS OF OR DIRECTLY BENEFIT FROM THE PROPOSED FEE INCREASE.

(c) AN ANALYSIS OF EACH OF THE FOLLOWING:

(i) THE RATIONALE FOR THE PROPOSED FEE INCREASE WITH A DESCRIPTION OF THE STATUTORY RESPONSIBILITIES THAT THE STATE MUSEUM INTENDS TO FULFILL WITH THE PROPOSED FEE INCREASE.

(ii) AN EXPLANATION OF THE SERVICES THAT THE STATE MUSEUM WILL PROVIDE WITH THE PROPOSED FEE INCREASE TO THIS STATE, POLITICAL SUBDIVISIONS, OTHER AGENCIES AND BUSINESSES.

(iii) A DESCRIPTION OF ANY EFFORTS TO AVOID FEE INCREASES OR TO REDUCE THE COSTS OR REGULATORY BURDEN, OR BOTH, TO THE BUSINESSES, PERSONS AND CONSUMERS THAT WILL BE DIRECTLY AFFECTED BY THE PROPOSED FEE INCREASE.

(d) A DESCRIPTION OF THE METHODOLOGY USED TO CALCULATE THE PROPOSED FEE INCREASE AND A DETAILED EXPLANATION OF THE COSTS INCLUDED IN THE FEE METHODOLOGY.

The ASM document should be revised to clearly articulate the rationale behind the fee increases; the statutory responsibilities that the state museum intends to fulfill with the increases; the services that will be provided because of the fee increases; a description of efforts taken to avoid/reduce fee increases and/or reduce costs; an in-depth discussion of the methodology and the variables used to calculate the proposed increases. AGFD suggests ASM utilize the outline put forth in the statute in order to clearly address the topics called out by the statute's language in a manner that would allow interested parties to understand what the proposed increases are and to evaluate the proposal fairly.

Additionally, there is need for a truly independent outside review of ASM's processes and costs in order to fulfill the spirit and requirements of the statute and to justify any proposed increases.

Specific Comments

- 1) **Page 2, ¶ 1, "Laws 2016"** should read "Session Laws 2016." The Act also amends Arizona Revised Statutes 41-1013. The word "mandated" is not adequately defined here.
- 2) **Page 2, Museum Background**—This does not provide a statutory basis supporting the declaration that it is the "official repository for archaeological collections from state, county, and municipal lands in Arizona." It is unclear whether or not the University has set apart sufficient space for the collections it houses and curates.

- 3) **Page 2, “Justification for the Development and Application of Rates and Fees”**— This section does not provide an actual justification for the development and application of rates and fees. It states there is no impact to the General Fund. This discussion is more appropriate for the section describing who would be directly affected by the proposed rate increase. It lists a statute and a policy that address “Duty to Report Discoveries.” This duty focuses on (human) “remains” and does not adequately address historic properties/ archaeological sites. The Arizona Board of Regents policy 8-205(I)(1) clearly addresses who bears costs involved in dealing with (human) “remains.” However, it is unclear how this relates to fees and rates for other services.
- 4) **Page 2, “Proposed Rates and Fees for Cultural Resource Management Services”**— The statute requires “The amount of the proposed fee increase.” This section as written provides numbers, but does not explain what the actual increase is. This section mentions federal agencies. Under “Museum Background” (above) there is no mention of federal agencies. How do they fit into this process? Also, if there is no charge for an Antiquities Permit, why is it included here?
- 5) **Page 3, “Justification for Proposed Increase in Rates and Fees”**—As with the prior “Justification” statement above, this section is not so much a justification as it is a series of statements that are not backed by any data or analysis. Is the problem actually related to funding, or could it be addressed through better organization, management, or more efficient processes? The current review does not sufficiently address methods for reducing costs and minimizing fee increases by taking a “lean management approach” at ASM.
- 6) **Pages 3-5, “Description and Explanation of the Methodology Utilized to Calculate the Proposed Fees”**—It is unclear from this section what the actual methodology is for calculating costs. There are a number of assumptions that seem to lack a basis and/or supporting data. An independent assessment of actual costs for performing services and of the efficiency of the current system would be helpful to identify process improvements and/or best management processes that could be implemented. Additionally, there is no breakdown or examination of what duties can reasonably be carried out by “low-level” employees vs. the very highly paid “senior personnel.” Again, a fully independent audit might shed light on this issue and the costs actually necessary to adequately carry out the program.
- 7) **Page 4, “Framework for Rate and Fee Structure”** states that cost recovery can be achieved through “task-based fees” or “time-based fees.” There is no discussion regarding whether or not substantial cost savings could be achieved through efficiencies gained through creation and implementation of a process improvement program. If simple, straightforward standards were established for submission of materials to ASM by project proponents, theoretically these submitted materials would require only a cursory review by ASM staff, leading to substantial savings. Furthermore, there is no discussion of how modern technologies, such as bar coding, might be applied to achieve even more cost savings.

It is unclear why there is a discussion of AZSite and NAGPRA. Both programs are apart from the proposed rate/fee discussion.

- 8) **Page 6** mentions that “UA Travel and other Financial Policies and Procedures are available on the web...” However, it is unclear as to how travel fits into the proposed increases. Are ASM staff travelling as part of their responsibilities and is this being funded through this rate increase?
- 9) **Page 6, Costs Wholly Allocable to Individual Rates and Fees, etc.** —What precisely is the “single service” being provided? This is not adequately defined. Furthermore, the costs for personnel do not clearly elucidate how this is an increase in rates and fees rather than an establishment of rates and fees.
- 10) **Page 6, Costs Wholly Allocable to the Issuance of a Permit**—Why is this included if it is not part of the proposed rate increase?
- 11) **Page 6, Costs Wholly Allocable to Fee for In-Perpetuity Curation of a Box of Artifacts**—None of the costs listed here are adequately defined. Furthermore, if clients are required to prepare collections for curation, and those requirements are enforced, why are there costs for archival supplies? Also, standardized museum quality compact shelving should last for more than 20 years. Also the RCM model is mentioned here but not explained until next page, creating confusion.
- 12) **Page 7, Current Year Costs**—See previous paragraph.
- 13) **Page 8, Office Supplies**—There is no justification for the number provided.
- 14) **Page 8, Facilities and Administrative Costs**—The Arizona Board of Regents is required by statute to “set apart sufficient space to accommodate” the museum. These charges should therefore be borne by the Board of Regents, not ASM clients.
- 15) **Page 8-9, Allowable Costs not included (sic) in the Proposed Rates and Fees**—It is unclear in this heading whether or not this is referring to establishing rates and fees or increasing rates and fees. Furthermore, while this section asserts that these factors were not included in determining the proposed rate and fee increase, nothing here insures that any associated costs won’t be included in future rate hikes. Will the cost of retrofitting be passed along to clients if alternative funding is not identified? Will the cost of moving collections be passed along to clients?
- 16) **Page 9, Independent Review of Proposed Rates and Fees**—It appears that this review was done internally by the University, not by an independent outside firm. If this is the case, it was not a truly independent review. The Department recommends that an independent review by a firm not affiliated with the University be done.
- 17) **Page 10, Example for Illustration**—The new structure costs seem high. According to this example, it is more expensive to register a project than it is to excavate a burial, and registering a survey project is only slightly less expensive. The cost for curation of

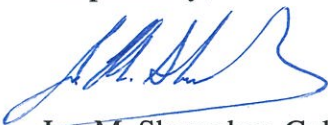
documents and artifacts is also high and does not seem to be clearly justified in the current document. Costs for burial agreements and consultation are also very high, as these documents should for the most part be boilerplate. Nowhere is there any sort of process analysis to try and identify efficiencies which could save clients substantial costs. Finally, a charge of \$1321 to intake/archive an inch of documents seems very high.

- 18) **Page 10, Entities Directly Affected by Rate and Fee Increases**—There appears to be no evidence supporting the claims in this section. It is unclear how this proposal is “responsive” to concerns expressed by sponsors. The proposed rate and fee structure is not transparent as presented here. It is unclear exactly how project sponsors, Arizona residents, or tribes will benefit. Finally, the last paragraph states that the information and objects recovered from projects will be studied, documented, and curated in perpetuity for ongoing research and use in educational programs and exhibitions. No data is offered to support this statement. It would be enlightening to know exactly how much the collection is actually used for these purposes.
- 19) **Page 11-12, Explanation of the services ASM will provide with the proposed increased rates and fees (sic)**—This lists several “services,” yet earlier on page 6 the document discusses how “benefits of costs can be directly associated with the provision of a single service.” This is confusing, is it one service or many? Many of these tasks seem repetitive, time consuming, and are things that lend themselves to automation.
- 20) **Page 13, Cost Mitigation Efforts**—Nothing in this document suggests that ASM has engaged in a serious outside independent review of their processes and procedures to specifically determine whether or not the existing processes are clunky and antiquated, and whether there might be cheaper, better, more efficient ways of doing things. The **Future Curation in UA Warehouse** section speculates that a new facility can be operated at a lower cost than at present, and that “If realized, these cost reductions will be built into the rates and fees” and “the benefit passed through to project sponsors.” There is no data offered to support this speculation, and this also calls into question the issue of whether or not the Board of Regents is fulfilling its obligation to “set apart sufficient space to accommodate” the materials housed by ASM.

In summary, our main concern is that the increases do not seem to be justified nor are they very transparent in the current document. Furthermore it is unclear that the document actually provides what is required by the revised statute.

Again, the Arizona Game and Fish Department appreciates this opportunity to comment and to work with you and your office on this important issue.

Respectfully,



Jon M. Shumaker, Cultural Resource Compliance Manager
Arizona Game and Fish Department

Director Patrick Lyons
Arizona State Museum
University of Arizona
PO Box 210026
Tucson, AZ 85721-0026

March 11, 2017

Director Lyons,

We appreciate the opportunity to comment on the new fee structure being proposed by the Arizona State Museum (ASM). The ability to engage with the museum, discuss new fees and weigh in on those fees prior to their going into effect is something we have not had the opportunity to do previously and we appreciate the efforts that have gone into hearing our concerns.

We would first like to commend the Arizona State Museum on their willingness to move toward a more scalable fee structure. A scalable fee structure is consistent with our articulated collective position and, in our estimation, moves toward a fee structure that will more accurately reflect the needs of the regulated community and ASM.

However, we remain concerned with the quality and amount of supporting data provided to coincide with the proposed fees. Despite two informal meetings to discuss fees and both formal and informal requests, we have not been provided detailed budget information related to ASM operations by ASM. Both of the meetings hosted by ASM were interesting but were general in nature and lacked the detail necessary to have a meaningful discussion about the proposed fees. It was not until we sought the information through the Public Records Office, outside of this formal process, that we got access to basic budget information about ASM.

Similarly, the proposal posted on the ASM website and in the Secretary of State's Administrative Register does not adequately support the fee structure that has been proposed. The proposal lacks the required detailed description of the costs associated with the methodology. Without that description stakeholders cannot evaluate the fees being charged in comparison with the actual costs of providing services, the total amount that is projected to be raised through fees or how much of the ASM budget will be covered by fees.

These comments will focus on three main concerns regarding the proposed fee increases 1) before a fee increase is sought, streamlining and efficiencies should be fully explored to ensure that wasteful or inefficient practices are not being further funded, 2) the examples provided in the proposal lack the appropriate detail to make a reasonable judgment and raise questions about the amount of manpower and time spent processing items to be curated, and 3) the fee proposal increases fees significantly above fees charged by comparable organizations in other states.

The proposal alludes to fees being derived using a cost basis and a recognition that under accounting principles costs must meet certain criteria to be included in the fees. According to the proposal they must meet the following criteria:

1. Necessary and reasonable
2. Properly Allocable
3. Readily Determinable
4. Consistently and uniformly applied
5. Substantiated with adequate documentation

We agree with these criteria and believe costs should meet these criteria prior to being included in rates and fees charged by ASM for services. However, without the proper documentation to determine whether the proposed fees are justified, we as stakeholders cannot support the proposed fees despite the assurances by ASM that all costs associated with the rates and fees meet these criteria.

While we appreciate ASM's efforts to reduce costs through the use of compactor shelving and the acquisition of space in the University of Arizona Warehouse, we would like to have additional conversations on how the operations of ASM could be streamlined further and regulatory burden could be reduced. In the September informal meeting stakeholders expressed an interest in allowing project sponsors to combine permits on large jobs. In addition we suggested a discussion about what can be done to alleviate the burden on ASM in terms of regulatory compliance. Despite these requests, no discussion on these efforts has taken place. We do not believe ASM has fully explored means to reduce costs or streamline processes.

In addition, while we fully support protecting cultural resources, we believe meaningful discussions related to the reduction in volume in items to be curated by the museum are warranted. We would like to explore the possibilities of more limited and representative samples to be curated, avoidance of cultural sites through planning and more selective collection of artifacts. This is in line with the curation practices of other similar museums, and would allow them to continue to comply with mandated programs without incurring costs associated with over-collecting items.

Establishing a system to selectively curate artifacts is particularly important given the backlog of items left to be catalogued mentioned in the Notices of Public Information (page 419). ASM credits this backlog to the historical under recovery of costs from project sponsors and the lack of necessary resources to provide services related to state mandated programs. However, analysis of budget information acquired through a public records request indicates nearly a third of personnel costs attributed to mandated programs and approximately one tenth of the budget are expended in this area. Meanwhile budget line item associated with non-mandated programs is double that of mandated programs.

Additionally, analysis of information provided as part of the same records request reveals 44.2 total FTE's employed by ASM (Appendix D), roughly double the amount of FTE's at the Office of Strategic Planning and Budgeting, 33 percent larger than the state's Radiation Regulatory Agency and similar in size to the Department of Liquor Licenses and Control. The ASM serves a valuable function in protecting culturally and historically significant artifacts. It is unclear how the backlog of the state's archaeological artifacts could be processed in a timely and efficient manner.

The assertion that the ASM can be more efficient is evident in the “Example for Illustration” provided in the Notices of Public Information (page 424). Although the exact inputs were not provided in the example, it appears rendering services is overly time consuming for ASM staff even when they are provided all the requisite information. For example, cultural resource management firms (CRM) are required to submit detailed Project Registration Forms, provided by the ASM, to the ASM for project registration. In the example provided it is projected that it will take ASM staff between 8.6 hours (Professional rate) and 28.4 hours (Assistant rate) to simply register a project. In contrast, Consultation Regarding Human Remains Discovery on State Lands in the example assumes 8 hours. This appears to assume that registering a project with information already provided by a CRM requires staff resources equivalent to those required for consultation regarding human remains, primarily because CRM firms are required to provide all the requisite registration information on a form required by the ASM. One noted discrepancy is that the tasks listed for both Registration for Monitoring Project and Registration for Testing/Excavation Project are identical (page 425), yet in their example ASM indicates it takes between 1.6 hours (professional time) and 5.4 hours (assistant time) longer to register a Testing/Excavation Project. It is not clear from the example how or if these projects are different.

Another concern raised by the “Example for Illustration” is the cost and ASM staff time associated with Collections Intake. In the example it takes between 10.5 hours (Professional rate) and 34.7 hours (Assistant rate) to process a single curated box. The specific tasks associated with Collection Intake (page 225) appear to duplicate many efforts, as CRM firms are required to provide much of the information in formats that are meant to be easily assimilated into ASM’s databases. The ASM’s curation manual *Requirements for the Preparation of Archaeological Project Collections for Submission to the Arizona State Museum* has detailed instruction for submittal of artifacts. Many of the tasks listed as being accomplished and/or performed by ASM staff is already required by the manual to be completed by a CRM. It is unclear why it would take between 10.5 and 34.7 hours for ASM staff to process a single box when the manual requires all of the artifacts to be labeled, inventoried, and cataloged (in a ASM useable database) prior to curation. The ASM curated 441 boxes in 2016, using the example processing times it would have taken ASM staff between 4,630 and 15,302 hours in staff time to process that number of boxes. If these numbers are indeed accurate, there are surely improvement that could be made to remove duplicative efforts in curation, and cut down on staff resources necessary to process each box.

Given the exorbitant processing times predicted using the example, while acknowledging that projects vary in complexity and size, we request an actual project specific examples, representative of a typical project the ASM receives, listing the actual time it takes to register a project and curate one box of artifacts. Included in the example should be details regarding what staff classification is responsible for much of the work and whether or not students participating in Work Study are included in these efforts.

Given the limited information provided by the ASM during the process of discussing this fee proposal, it was difficult to know whether the adjusted fees were appropriate. A study commissioned by the National Park Service is particularly helpful in evaluating the fees in the proposal. The study, surveyed 221 repositories in 2007 and 2008 to catalogue the introduction of curation fees nationwide, how fees were structured, how these fee structures varied nationwide, and the nature of the criteria used to establish a fee structure. More than half of the museums contacted (55%) were university or university

associated museums similar to ASM. The study found nationwide fees charged by repositories ranged from \$72.50-\$1,200 per box/Cu.Ft. (Appendix A, page 6, table1)

The study further refines these numbers by providing ranges for fees by National Parks Service regions. Arizona is part of the Intermountain Region, where repositories fees ranged from \$234-\$1,000 per box. Other states included in the Intermountain Region include Texas, Oklahoma, New Mexico, Colorado, Utah, Wyoming and Montana.

While the NPS study was conducted in 2008, we conducted a more recent sampling of fee structures for repositories in other state, which shows similar results. For example, publicly available information for repositories in intermountain states shows a stark contrast in per box fees for curation. Table 1 illustrates current per box curation fees charged by repositories in each of the intermountain states. Each of these repositories administers their collections under the same federal standards and guidelines and, like ASM, curates these artifacts in perpetuity. Excluding the ASM proposed fees and the fees for Montana which charges a \$250/box accession fee and annual charge, the average of these per box curation fees is \$633.03 per box.

Table 1
Per Box Artifact Curation Fees in Intermountain States

Repository	State	Per Box Fee
Arizona State Museum	Arizona	\$3,004 (proposed)
University of Colorado at Colorado Springs –Anthropology Seyhan Dwelis Archaeological Repository	Colorado	\$1,000
University of Montana Anthropological Curation Facility	Montana	\$60/yr
Museum of Indian Arts and Culture Santa Fe	New Mexico	\$485
Sam Noble Oklahoma Museum of Natural History Department of Archaeology	Oklahoma	\$271.16
University of Texas Center for Archaeological Studies	Texas	\$476.51
Utah Museum of Natural History	Utah	\$565.29
University of Wyoming Archaeological Repository	Wyoming	\$1,000 (included documentation)

In comparing the range of per box fees to other intermountain repositories in this analysis to the fees proposed by ASM, the proposed fees are significantly higher than fees charged in other states with the same regulatory compliance responsibilities. In this case, the fees range from three to ten times higher than other states.

A similar comparison of documentation curation fees again shows a striking contrast between the proposed ASM fees and those fees charged in other states according to the National Park study as well as a sampling of other states we conducted. According to historical records in 2008 when the study was conducted, the volumetric or per box fee levied by ASM was \$593. If you were to apply a simple calculation to estimate inflation, the charge per box would result in roughly \$958.42/box which is consistent with the current per box charge and significantly less than the \$3,004 per box proposed charge. (Appendix B).

Table 2 illustrates current document curation fees charged by repositories in each of the intermountain states based on our sampling. Each of these repositories administers their collections under the same federal standards and guidelines and, like ASM, curates these documents in perpetuity

Table 2
Document Curation Fees in Intermountain States

Repository	State	Document Curation Fees
Arizona State Museum	Arizona	\$2,577/ft (proposed)
University of Colorado at Colorado Springs – AnthropologySeyhan Dwelis Archaeological Repository	Colorado	\$500/ft
University of Montana Anthropological Curation Facility	Montana	\$600/ft (charged by inch)
Museum of Indian Arts and Culture Santa Fe	New Mexico	\$485/ft \$40.42/inch
Sam Noble Oklahoma Museum of Natural History Department of Archaeology	Oklahoma	\$78.43/inch
University of Texas Center for Archaeological Studies	Texas	\$1200/ft \$100/inch
Utah Museum of Natural History	Utah	\$75.38/2” Document Box \$188.43/5” Document Box
University of Wyoming Archaeological Repository	Wyoming	Paperwork included in per box fee

Additionally, given the historical volume of boxes collected by ASM, the \$3,004/box fee would significantly increase the annual revenue related to mandated programs. In fact, based upon the 2016 collection of 441 boxes, the \$3,004/box charge alone would result in over \$1.3 million in fees collected from project sponsors or more than double the total expenditures on mandated programs and triple the amount of revenue collected from fees in 2016. Using the 2015 box collection activity of 858 boxes results in nearly \$2.6 million in fee revenue from project sponsors from the curation fees alone and a minimum of \$41,000 in additional fees for collections intake. (Appendix C)

The main driver of this significant increase in fee revenue comes from the proposed collection of “in-perpetuity” fees. The disposition of these fees are not well defined and it is unclear how this revenue is

to be utilized. The revenue from these fees is far more than necessary to cover current year costs however there appear to be no assurances that the additional revenue will not be used to support other programs.

Given these concerns, and the disparity in pricing between ASM and other similarly situated museums, we strongly urge ASM to withdraw the current proposal until such time as additional budget information is provided and investigations into greater efficiencies can be conducted.

In addition, we suggest a comprehensive study of current fees charged by repositories in other intermountain states. We as project sponsors and the regulated community in Arizona would expect fees charged ASM to be consistent with the average of other states in the intermountain region.

We look forward to your detailed responses to the issues outlined in these comments and once again appreciate the opportunity to comment on the proposed fee proposal.

Respectfully Submitted:

Grand Canyon State Electric Cooperative Association
Arizona Generation and Transmission Cooperatives
Arizona Public Service (APS)

CC: Regent Patterson
Senator Gail Griffin
Representative Bob Thorpe

Appendices:

National Parks Service Study (appendix A)
Per Box Fees Adjusted for Inflation (Appendix B)
ASM Bulk Boxes doc (Appendix C)
ASM. Departmental Headcount (00074737xC3E11) (Appendix D)
ASM. Revenue - Expenditures. FY 2016 (00074730xC3E11) (Appendix E)
ASM. Fees (00074728xC3E11) (Appendix F)
ASM slides. SB 1418 Implementation (00074722xC3E11) (Appendix G)

Appendix A

National Parks Service Study

A Decade of Study into Repository Fees for Archeological Curation

Studies in Archeology and Ethnography #6

S. Terry Childs and Seth Kagan

Archeology Program

National Park Service, Washington, DC

2008

Archeology Program

National Park Service
Department of the Interior



A Decade of Study into Repository Fees for Archeological Curation

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2008

Introduction

Many repositories, particularly those associated with university and state museums, have a long history of providing curatorial services at no cost to the collection owners to manage, store, and care for archeological collections created during projects on federal, state, local, and private lands. At least two factors were involved in the development of this relationship. One was the enactment of the Antiquities Act in 1906. It required that “the gatherings” from an archeological investigation on federal land be placed “...for permanent preservation in public museums (16 USC 432),” such as university and state museums. The second factor was that university faculty and students were often involved in the archeological projects that created the collections of artifacts, ecofacts, and associated records. The resulting collections were then stored in their affiliated university museums, and the ensuing curatorial services were often provided to the federal or state agency collection owners in an informal exchange for access to and use of the collections in university research and education. This worked out well for both the museums and government, especially federal agencies that did not have repositories or adequate staff to catalog, store, and manage these collections. At the state level, some state-funded repositories, especially museums, existed and curated archeological collections from state lands.

The enactment of additional historic preservation laws, including the National Historic Preservation Act of 1966 (NHPA), the Archeological and Historic Preservation Act of 1974 (AHPA), and the Archaeological Resources Protection Act of 1979 (ARPA), and their implementing regulations initiated changes in that relationship. Several things happened. First, a sharp increase in the number of federal- and state-mandated archeological projects resulting from those laws yielded an equally sharp rise in the number of collections being sent to repositories for curation. Although repositories might have had room to store new collections in those years, they did not have adequate staff to catalog, conserve, box, and provide access to the sudden influx of collections. Nor did they have proper security and fire prevention systems in place (Ford 1977; Lindsay et al. 1979, 1980; Marquardt 1977; General Accounting Office 1987).

Second, the regulations “Curation of Federally-Owned and Administered Archeological Collections” (36 CFR Part 79 <<http://www.nps.gov/archeology/TOOLS/36CFR79.HTM>>) were issued in 1990. These regulations clearly state that federal agencies own the new and existing collections resulting from publicly-supported projects on federal lands or from federal undertakings under their control, and are responsible for the long-term curation and care of these collections. The regulations also establish procedures and standards for the proper curation of federal collections, which include many potentially costly storage and housekeeping requirements that most repositories did not have in place. A number of state and local governments adapted these regulations into state and local regulations and policies, which affected an even broader range of repositories.

Finally, the archeological community has long recognized that archeological collections are irreplaceable, non-renewable resources. However, it is relatively recent that its members have come to appreciate just what it means to preserve archeological artifacts, records, and reports in perpetuity for research, education, and heritage uses (Marquardt et al. 1982; also see Sullivan and Childs 2003 for a history of the plight of archeological collections in the 20th century.) This involves a significant commitment by archeologists to properly budget for collections recovery and care as they develop each project scope of work.

All of these factors increased costs for those repositories accepting archeological collections for curation. Who is responsible for covering these costs? From where will the necessary funding come? Although 36 CFR Part 79 identified federal agencies as responsible for the costs of collections from federal lands, this would not cover collections from state, local, and private lands. Repositories began to react. By 1975, at least one repository implemented a fee for the long-term curation of collections and, by 1985, over 30 repositories across the U.S. were charging curation fees. The days of curatorial services for archeological collections at no cost to their owners were coming to an end.

This study examines the results of three informal, yet systematic investigations into the adoption and use of repository curation fees across the United States. Pertinent information was assembled in 1997/98, 2002 ([Childs and Kinsey](http://www.nps.gov/archeology/TOOLS/feesStud.htm) <<http://www.nps.gov/archeology/TOOLS/feesStud.htm>> 2003), and 2007/08. The goal of the first effort conducted in 1997/98 was to investigate the introduction of curation fees nationwide, how fees were structured, how these fee structures varied nationwide, and the nature of the criteria used to establish a fee structure. The surveys conducted in 2002, and continued in the current 2007/08 study, also examined key trends in the costs of curation across the U.S. and, when possible, identified issues related to those trends. None of the three projects were exhaustive. They built on each other to provide the most comprehensive body of information compiled to date on this important topic.

Project History

The original stimulus for this project was simple. In 1996, Childs attended a conference in Berkeley, California called "Partnership Opportunities for Federally-Associated Collections." Sponsored and organized by the Interagency Federal Collections Working Group (now called the [Interagency Federal Collections Alliance](http://www.doi.gov/museum/fedcollalliancehomepage.htm) <<http://www.doi.gov/museum/fedcollalliancehomepage.htm>>), the goal of the conference was to foster discussion about collections issues between staffs from federal agencies and non-federal repositories. One issue pervading the conference sessions concerned the high costs of curation and the continuing rise in those costs. It became clear during the conference that repositories were beginning to respond to rising costs by charging fees for the curatorial services they provided. Neither the staffs of the federal agencies or the non-federal repositories seemed to fully embrace this trend. However, no one knew, for example, how these fees were calculated, which repositories charged fees across the country, how the fees were being used, and related issues. These questions required investigation.

Several sources were used to select the repositories contacted to participate in the 1997/98 study. The most obvious was from the list of participants at the 1996 conference in Berkeley. Another source was the list of respondents to the 1994 Survey of Federally-Associated Collections Housed in Non-Federal Institutions conducted by the Department of the Interior [Museum Property Program](http://www.doi.gov/museum/) <<http://www.doi.gov/museum/>> in cooperation with the Interagency Federal Collections Working Group. The institutions that reported holding significant archeological collections in the 1994 survey were used in this repository fee study. Finally, the 1996-97 American Anthropological Association Guide to Departments of Anthropology was consulted for educational institutions with archeological collections housed in university or college museums. Only institutions that curated archeological collections in curatorial facilities were included in the survey results.

The 2002 informal survey ([Childs and Kinsey](http://www.nps.gov/archeology/TOOLS/feesStud.htm) <<http://www.nps.gov/archeology/TOOLS/feesStud.htm>> 2003) solicited input from the 1997/98 respondents that charged fees or were considering it. Word-of-mouth was also used to identify other possible participants across all fifty states and the District of Columbia. As in 1997/98, concerted effort was expended trying to find at least two repositories in each state that curated significant numbers of archeological collections. This was not always possible.

Study Participants in 2007-08

The 2007/8 survey was conducted from September 2007 through March 2008. Phone calls and emails were used to contact curatorial staff at 221 repositories, which were identified from a number of sources. First, the list of repositories used in the 2002 survey provided the foundation for the project. Second, the institutions contacted in 1997/8, but not in 2002, were re-contacted to determine if their status had changed in ten years. Third, a careful search of the Internet for other repositories charging fees was conducted. Fourth, each repository that responded was asked for the name and contact of other repositories in their region or state. Finally, the Bureau of Land Management (BLM) provided a list of non-federal repositories known to hold BLM collections. The latter four methods yielded many more repositories to contact, including a number of Native American repositories.

	1997/98	2002	2007/08
# Repositories Contacted	128	123	221
# Repositories that Responded	108	112	180
# Repositories that Charge Fees	59	69	96
# Repositories Considering Charging Fees	10	4	12

Table 1: Summary of the Repositories Involved in the Informal Studies

Of the 221 repositories contacted, 180 (81%) graciously responded (see [Credits & Acknowledgments](#) for a list of the repositories that responded.) Although this is a somewhat lower response rate than in 2002 (91%), the actual number of respondents was much higher (Table 1). Of these, it is noteworthy that 11 repositories are not accepting new collections due to lack of space, and one repository that participated in the previous surveys has closed due to administrative and other factors.

More than half (122 [55%]) of the repositories contacted were university or university-associated museums. Of those that responded, 26 only curate collections created by university staff while, as discussed below, more than half charge fees. Several state institutions curate only collections from their state, and may or may not charge fees. Private museums, non-profit repositories, and city-owned institutions were also contacted and may or may not charge fees. The Native American repositories and cultural centers that were contacted and responded tend not to charge fees and only accept archeological collections that meet their scopes of collections related to specific Native American cultural traditions.

Many repositories involved in this study expressed interest in our results. Some remarked about their use of the results from the 1997/98 and 2002 surveys. Each responding repository also granted permission to use their data in this and other reports. No institutions were hesitant to provide dollar figures for their fee structures, although some are in the process of changing their fee structure.

A Brief History of Curation Fees

Based on information provided during the three informal survey efforts, a few repositories began charging fees before 1975, not too long after the enactment of the NHPA in 1966. As the number of collections from federally-mandated archeological projects kept increasing due to NHPA and other federal and state historic preservation laws, the evidence suggests that many repositories could not afford to continue to cover all the costs to curate collections they were receiving. Over time, the number of repositories charging fees has increased. The following breakdown shows the decade when the repositories that responded in the 2007/08 informal survey began to charge fees¹:

¹ Seven repositories included in this breakdown stopped accepting collections and charging fees for various reasons, and are counted in the 2007/08 informal study as charging fees. Three repositories that are counted in the 2007/08

- 1970s: 8 repositories
- 1980s: 40 repositories
- 1990s: 33 repositories
- 2000-2008: 19 repositories.

The number of repositories that began charging fees in the first decade of the 21st century suggests that the trend for new repositories to charge fees continues. This trend does not seem to be leveling off based on the comparative data of repositories that considered charging fees in the three surveys. Twelve (13%) of the repositories that currently do not charge fees are considering doing so in the near future. This compares to four (6%) that were considering fees in 2002 and 10 (17%) in 1997/98.

Curatorial Fee Structures for Collections of Artifacts in 2007/08

One hundred eighty repositories responded in 2007/08, although 14 (8%) respondents said they are not repositories of archeological collections or provided other reasons why they could not be included in the following analysis². Seventy (42%) repositories do not charge fees, 36 of which do not charge specifically because they only curate collections they own and are recovered by their staff. On the other hand, 96 (58%) repositories charge fees for collections; primarily those of federal and state agencies, private firms that have a contracted obligation to provide collections storage and care, usually "in perpetuity", and some non-profit organizations. Some repositories charging fees end up owning the collections they curate for a fee, such as state museums curating collections from state land. Other repositories do not own the collections they curate for a fee, such as collections from federal land or federal undertakings. Almost unanimously, repositories do not charge fees for a collection that is deeded as a gift from private landholders.

Figure 1 provides comparative fee data assembled in 2007/08, 2002, and 1997/98 for artifact collections. Due to the length of the chart, only repositories that charged fees or said they were considering doing so in at least one of the studies are included.

The fee structures currently used by U.S. repositories vary considerably in three ways:

1. the unit of assessment (i.e., the basic unit used to determine the size of a collection and calculate the appropriate curation fee);
2. the type of service(s) provided for a fee; and,
3. the amount of the curation fee.

Regarding the unit of assessment, of the 96 repositories charging fees, 82 or 85% calculate the appropriate fee by using the cubic foot (ft³.) They may also base their charge on a standard archival box size that is close to a cubic foot (1.3 ft³.) Some variation occurs with this unit of assessment. One repository has a sliding fee scale; the fee per box decreases as the number of boxed increases in increments of five or ten boxes.

While most repositories use the cubic foot as the standard unit of assessment, a few repositories use other unit measures. A few repositories have other box sizes, including 21x21x3 inches, 18x12x6 inches, a "banker's" box, and a "drawer." Since it was not feasible to calculate in perpetuity or annual fees by a box unit, one city repository charges \$20 per person-field day with a minimum of \$100. Several repositories determine their fee on a case-by-case basis. One deals with the collection as a whole, rather than by box, and considers the total cost of the storage space to be used, the supplies needed, and the labor involved in processing the collection.

informal study as charging fees are not included in this breakdown because they did not state when they began charging fees.

² Therefore, the total number of respondents for analytical purposes is 166.

The primary types of fees reported by repositories in the 2007/08 informal study are similar to those reported in the previous two studies:

- One-time fee: usually assessed when the collection is deposited at a repository and is intended to cover all curation costs "in perpetuity;"
- Processing fee: for cleaning, conserving, packaging, and/or cataloging new collections according to the repository's collection management and acceptance policies, and may include charges for the staff hours involved;
- Annual fee: for care of the collection on a yearly basis that is usually assessed by the ft³;
- 5 or 10 year assessment – a fee structure that is maintained for a span of 5 or 10 years and is reassessed when a curation agreement ends and a new one is negotiated;
- Registration fee: for registering a collection with the repository prior to deposit;
- Single artifact-related fees: different fees for different types of single or special artifacts; and,
- Combinations of the above, which is quite common depending on the size and complexity of the collection being accepted for curation.

A new fee type identified in this study is for maintenance, which is charged on a periodic basis for additional care and/or conservation of individual objects or portions of collections above and beyond regular curation services. Eleven (11%) repositories inform the collection owner of their intention to charge an additional fee for maintenance when they determine that certain materials in a collection need extra care.

Almost all the repositories that charge fees (95 [99%] of 96) have a one-time, in-perpetuity fee. Thirteen (14%) repositories also have a processing fee, regardless of whether the collections have been prepared according to their standards. Twenty three (24%) repositories charge an annual fee, usually for the federal collections. In some of these cases, the repository has an in-perpetuity fee structure for collections from state land and an annual fee for federal collections. Several of these repositories noted that they are considering dropping the one-time fee and only charging an annual fee in the future.

A significant sub-group of the respondents (101/166; 61%) are public university or university-related repositories. Regarding the extent to which this sub-group charges fees and what types, the following summarizes the key findings³:

- 59 charge fees. Some of the variation in these fee structures are: one repository decreased its fees since 2002, but will probably increase them in the future due to lack of space and the need for a new facility; two do not have a standard fee structure, but one assesses fees based on the different phases of a project and the other operates on a case by case basis.
- 26 only curate collections created by their university staff and do not charge those staff for curatorial services. Of these, 13 used to accept new collections and charge fees, but stopped because of lack of space and/or lack of support from their university administrations.
- 12 accept collections not made by university staff, but do not assess fees for them. This is a noticeable drop from the 2002 study when 20 did not charge fees for collections not made by university staff. However, the trend toward implementing fee structures continues since four more of these repositories are now considering charging fees. This compares to two in 2002 and seven in 1997/8.
- One accepts monetary donations.

Regarding differences in the amount of curation fees charged for in-perpetuity curation of artifacts across the United States, Childs and Kinsey (2003) demonstrated considerable variation in both the 2002 and 1997/98 informal studies. However, the highest curation fees consistently tended to be charged in the western states.

³ Seven repositories were not included in this analysis, primarily because they do not curate archeological collections.

Childs and Kinsey proposed that the higher fees in the west had to do with the higher proportion of public lands and the large numbers of federal, state, and local government-mandated archeological projects there that yield collections, some very large in size.

The previous findings are corroborated by the variation in the 2007/08 in-perpetuity fees illustrated in [Map 1](#). This map shows the distribution of the highest fee charged by the responding repositories in each state. [Map 2](#) shows the low-high range of fees charged by the 2007/08 responding repositories in each state with the same background colors as in Map 1. These data are summarized on a regional basis in Table 2 below.

Region	Per Box/Cu.ft.
Northeast	\$85-500
Southeast	\$125-330
Midwest	\$150-1000
Intermountain	\$234-1000
Pacific West	\$72.50-1200
Alaska	\$200-500

Table 2: Range of In-perpetuity Fees by Region in 2007/08.

Overall, repository fees throughout the country are increasing everywhere, although one repository in California recently reduced its fee from \$1500 to \$800 per cubic foot. There are fewer states with repositories that do not charge fees, and more of those repositories not charging fees are considering instituting fees. Interestingly, several 2007/08 respondents that charge fees in the western states noted the significant number of collections they receive and the related costs they must bear.

Curatorial Fee Structures for Associated Records in 2007/08

A collection of artifacts from an archeological project has greatly limited utility for research, interpretive, or heritage purposes if it lacks its associated records (Sullivan and Childs 2003; Childs and Corcoran 2000). These records provide key contextual information about the artifacts recovered in the field, including information about their cultural and technological attributes, the history of their care in the repository, and other data. This information is critical to the research, educational and heritage values of the artifacts, as well as to interpretation. Records include field notes, maps, photos, artifact catalogs, preliminary reports, and laboratory notes, all of which may be in paper or digital formats, as well as electronic databases. Associated records must be handled differently than objects (Drew 2004; Eiteljorg 2004,) yet should be curated in the same facility as the objects from the same investigation to facilitate research and other purposes.

[Figure 2](#) provides comparative fee data assembled from all three informal surveys for the associated records. The repositories charging fees for associated records in 2007/08, as in 2002 and 1997/98, can be put into two groups. In one group, the repository does not differentiate between the artifacts or the associated records in its fee structure; the same in-perpetuity cubic foot fee is charged to include both without distinction. The other group of repositories has an explicit fee structure for the associated documents, which may or may not be different from the fee charged for the artifacts.

In 2007/08, repositories with a separate fee for the associated documents usually use the linear inch or linear foot as the unit of assessment. Maps and other large formatted paper sometimes incur an additional fee because they take up more space and often require special handling. Several repositories also charge a separate fee for non-paper materials in 2007/08, such as photos or digital media. Another repository does not charge by the linear foot, but by the processing time needed to prepare the associated records for curation and storage.

Fee Structure Type	1997/8	2002	2007/8
Separate Fee for Records	31 (52%)	40 (58%)	43 (45%)
Included in Artifact Fee	28 (48%)	29 (42%)	53 (55%)
Total # With Fees	59	69	96

Table 3: Repository Fee Structure Types for Associated Records over Time

The data about associated record fees over time are revealing (Table 3.) Although all the repositories in the three surveys charged a fee for associated records, the way the fee was structured has vacillated over time. Between 1997/98 and 2002, more repositories charged separate fees for the associated records and the artifacts, whether or not it was for the same amount. By 2007/08, however, a higher percentage of repositories simply combined both artifacts and associated records into one fee assessed by the cubic foot. A possible explanation for this change is expediency. Several repositories that charge the same fee acknowledged that they do so for simplicity purposes, since they fear it is more difficult to keep track of different fee schedules. However, some repositories with the same fee noted that they added more to their cubic foot box fee to cover the different costs of the associated records. This finding indicates that some repositories carefully consider the different costs involved for associated records as opposed to artifacts.

	1997/8	2002	2007/8
Same Fee as Artifacts	25 (81%)	29 (72%)	20 (47%)
Different Fee from Artifacts	6 (19%)	11 (28%)	23 (53%)
Total w/ Separate Fee for Records	31	40	43
Lower Fee than Artifacts	5 (83%)	11 (100%)	13 (57%)
Higher Fee than Artifacts	1 (17%)	0	10 (43%)

Table 4: Repositories with Separate Fee Structures for Associated Records over Time

Related to the above finding is whether or not the repositories recognize that different care with different costs may be required for the two components of an archeological collection.

The difference between the number of repositories having an explicit fee structure that explicitly identifies associated records or a fee structure that does not is not that great (Table 3.) It is eye-opening, however, to examine the relative amount of the fee charged for associated records when it is explicit in the fee structure. Table 4 shows the notable rise in the number of repositories that set a different fee in their fee structure for associated records and artifacts over time. Even more revealing is the change from charging less than the artifacts to charging more, presumably after determining that the care of associated documents is more costly. In fact, several respondents in 2007/08 explained that the need for a different fee for associated records than artifacts is due to the different costs of archival records processing, dealing with those not on acid-free paper, and other long-term conservation requirements. Some recognized the additional requirements for the associated records when they reorganized their storage space and discovered the unacceptable condition of many records.

Finally, a new development regarding associated records has occurred since the 2002 study. With the rise of the digital age there has been a significant rise in the quantity of digital files and data archeologists send to repositories for long-term curation. The question, however, is what do the repositories do with these data? Many repositories store the data container – the compact disk, floppy disk, magnetic tape – in the same or separate box

as the paper records and presume the data in the container will be preserved. However, some are now downloading the files onto a server to facilitate future migration into appropriate formats for long-term preservation and to improve access for researchers and others. This is an exciting step forward, but the process incurs real costs for the hardware, software, and the staff expertise involved. Thus, a few repositories are now charging for this service, which range from \$6 to \$30 per gigabyte. It is likely that more repositories will recognize the additional care required for the digital media and will charge appropriate fees since so much vital information is now digital and is not reproduced on paper.

The Criteria Used to Assess Curation Fees

All three informal surveys asked about the criteria used to develop a fee structure, since the actual costs of curation are covered only if the fee assessment is adequately and accurately determined. The findings in 1997/98, 2002, and 2007/08, however, reveal that institutions vary considerably in the methods and level of detail they use to assess fees. In most cases, there was no single criterion used, but a combination of factors to make the best-educated decision on appropriate fees. The most common criteria are listed here in order of frequency, along with the number and percentage of repositories that mentioned each one:

- To cover overhead costs for processing collections, managing the repository building, and maintenance of a computerized database, among other things, necessary to preserve and use the collections according to federal regulations (in-perpetuity costs). (42 [44%])
- To meet per hour salary estimate for accessioning collections. (36 [38%])
- Consulted the fee structure of the repositories in the area and nearby states and used a comparable fee. (33 [34%])
- To meet annual self-storage facility fee or purchase of new storage equipment. (27 [28%])
- To cover estimated costs of environmental controls (e.g., heating/cooling, humidity) and inflation. (25 [26%])
- Best guess. (8 [8%])
- Consulted past NPS informal surveys on curation fees. (5 [4%])
- Fee legally set by county or state. (4 [4%])
- Consulted with conservation and financial analysts. (1 [1%])
- Considered what CRM firms will pay; in other words, what the market will bear. (1 [1%])
- Evaluated different phases of the archeological project (for fees established on a case-by-case basis). (1 [1%])

In general, the 2002 and 2007/08 informal surveys revealed that repositories are putting more effort into estimating the real costs of curation when developing or changing their fee structures. This is a positive development. Ten years ago, a large number of repositories charged the same fee(s) as their neighboring institutions and did not consider their real costs. This finding strongly suggested that the fees charged could not approach covering the true costs of curation. Currently, repositories regularly include a number of criteria when determining their fees, including: overhead costs for processing collections; building management and repairs; computer maintenance; professional staff salaries; rental of off-site storage facilities; purchase of new storage equipment; environmental controls; housekeeping; and, inflation.

Despite the use of better criteria to determine fees and the associated fee increases across the U.S., 60 (63%) of the 96 respondents that charge fees in 2007/08 reported that their fees do not cover the costs of long-term curation. Several of these respondents said that they do not charge higher fees to cover their real costs for fear that fewer collections will be deposited with them. They also seem to recognize what the market will bear and want to stay competitive with their neighbors. Eighteen respondents (19%) noted that the fees did cover their costs. This may be because they are the only repository charging fees in their state, they charge some of the highest rates in their state, or they charge annually, not one fee in perpetuity. Another ten (10%) respondents said that possibly, or hopefully, the fees will cover the costs of curation since they are just beginning to charge fees or

have just changed their fee structure. Another seven (7%) repositories did not know whether their fees will cover their costs. In the end, it seems that repositories are more content with their fees when they charge annually or in set time intervals, so the fees may be periodically reassessed. Several noted, however, that these types of fees are harder to administer and incur their own costs.

In fact, fees are usually collected by a repository either as the collection is being deposited or following an invoice. The funds are then placed in a general operating account. Only 19 (20%) repositories have an interest-bearing account for the fees. Trusts and endowments are included in this count, although they have restrictions on how and how much of the funds may be used. Notably, one state passed legislation to establish a trust account to use for curation.

Unfortunately, many state university repositories and state museums cannot use interest-bearing accounts due to institutional policy or state or local regulations. Some respondents said they could use an interest-bearing account, but choose not to because the monies will go to a general state account and will not be dedicated to the needs of the repository. Six of the 19 repositories mentioned above put only a portion of their fees into interest-bearing accounts and use the rest for ongoing curation purposes. They do not have the luxury of being able to put all the fee revenues into an interest-bearing account since some part is needed immediately to fund annual basic operations.

Five respondents said that they had discussed, or are in the middle of discussing, plans for obtaining an interest-accruing account.

Uses of the Fees

All three informal surveys asked about the intended use(s) of the one-time or annual curation fees once collected. While many institutions cited more than one use, the primary ones are listed below in order of frequency, along with the number and percentage of repositories that mentioned each:

- To cover initial processing and accessioning costs (cleaning, cataloging, shelving, conservation, acid-free materials and/or other general curation supplies) and the costs of long-term maintenance of in-perpetuity collections. (77 [80%])
- To pay for expansion and increase of space projects (e.g., pay for rented storage space in proper self-storage facilities). (16 [17%])
- To pay students and curation specialists for the routine maintenance of collections. (10 [10%])
- To combat rising costs of heating/cooling and electricity (general inflation). (8 [8%])
- To bring the collections up to Federal regulations set forth in 36 CFR 79 or to comply with the Native American Graves Protections and Repatriation Act. (6 [6%])
- To combat state budget cuts. (4 [4%])
- Are self-funded non-profits and must cover all costs through fees and grants. (3 [3%])

The intended use of the collected fees generally overlaps with the criteria used to develop a fee structure. This is because most of the uses mentioned related to long-term care of the collections, including the operations of the storage facility itself. In order to justify the fees, repositories must show a strong correlation between the criteria used to set the fee structure and the uses of the fee monies.

Key Insights and Trends over a Decade of Study

The benefit of conducting three informal surveys over a decade is that both trends and issues can be identified and then monitored to determine their significance. The following lists some of the trends and issues identified to date:

- The data from 1997/98 and 2002 indicated that curation fees varied unpredictably across the U.S. With the 2007/08 data, it is now clear that there will be at least one repository that charges fees in nearly all the states. There is at least one repository in most of the states currently without a fee-charging repository that is considering doing so.
- Curation fees continue to rise as repositories better understand the real costs of curation and increase fees to properly care for the collections. The current trend for many repositories, however, is to keep their fees comparable to their neighbors.
- The repositories in the western states continue to charge the highest fees. This is most likely due to the extensive federal and state lands in these states that are undergoing development and, therefore, require archeological compliance work and subsequent curatorial services. The high curation fees may be influenced by supply and demand (there are not enough repositories to handle the demand), but the high costs of property, utilities, and materials strongly impact the fees charged.
- Fewer repositories do not charge fees for curation. For example, 12 (7%) university-based repositories accept non-university collections without charging fees in 2007/08 in comparison to 20 (18%) in 2002. Clearly, the economic pressure to charge fees still prevails since four (2%) more of these repositories are now considering charging fees. This compares to two (2%) university-based repositories in 2002 and seven (7%) in 1997/8.
- In 1997/98, only a few repositories charged both a one-time in-perpetuity fee and an annual fee, probably because most tried to cover all their long-term costs in one fee. The 2002 and 2007/08 data reveal an increase in the number of repositories that charge both a one-time fee, as an initial entry and processing fee, and a minimal annual fee to cover yearly responsibilities, such as inspection, inventory, and conservation. Several repositories are considering only charging an annual fee and dropping the one-time, in-perpetuity fee.

This is a key issue that requires careful dialog between the repositories and the federal government agencies, in particular, that own and are responsible for the collections. This is because many collections are the result of compliance activities, often by a third party permittee, for a land-use action that requires mitigation (e.g., cell tower construction, oil pipeline). The permittee or proponent of the action pays for the curation fees out of the project budget, which ends when the project ends. There is no funding for continuing annual fees. Furthermore, many government agencies fund development projects, such as the construction of irrigation systems or highways, and lack appropriated funds for ongoing programs to pay for annual fees.

- There is a noticeable trend in repositories that now acknowledge the differences involved in curating artifacts as opposed to associated records and, therefore, have a separate fee for associated records in the fee structure. Furthermore, by 2007/08, there was a notable increase in the number of repositories that charge more for the associated records than the artifacts.
- Also related to associated records, a few repositories are beginning to address the significant amount of documentation that is now digital. Instead of storing the data container in a box, which does not deal with the actual data on the floppy disk or CD, a few repositories are downloading the digital records onto a server, associating them with the appropriate software, addressing migration issues, and dealing with long-term preservation of and access to the data. This critical process, however, has considerable costs and a few repositories are now charging a fee for this service. It is likely that more repositories will take on this service and charge accordingly.

- With each informal survey, some repositories added one or more new types of curatorial services and associated fees. In the 2007/08 study, two new fee-based services were identified. One is for properly curating digital records and the other is for maintenance. The latter involves additional care and/or conservation of individual objects or portions of collections beyond that covered by the one-time or annual fees already paid. The fact that repositories are adding new services and fees over time suggests that the curation of archeological collections is evolving and requires some new practices to uphold basic, professional standards.
- Repositories are becoming more selective in accepting collections through two primary means. One is through their scopes of collections, which identify specific characteristics of collections a repository will accept. These criteria include location of the archeological project and/or the associated time period or cultural history of the collection. The other means is through a repository's collections acceptance policy, which states the conditions under which the collection must be delivered to the repository. The collections acceptance policy is an important development, because the repository staff now can spend more effort on long-term care rather than initial processing of a new collection.
- There is a slow, but gradual increase in the number of repositories that are placing curation fee monies in interest-bearing accounts, including trusts and endowments. This is a sound economical approach that supports an optimistic future for the collections.
- The problem of finding adequate space to curate incoming archeological collections is increasing. For example, 26 university-based repositories in 2007/08 curate only collections recovered by their university staff; of these, 13 formerly accepted new collections and charged curation fees. They stopped because of lack of space and/or lack of support from their university administration.
- An issue raised from the 1997/98 and 2002 informal surveys – the need to standardize box sizes for better comparability of fees and services across repositories – has largely gone away. Most repositories base their assessment of collection size and fee structure on the cubic foot or the slightly larger archival box. The linear inch or linear foot is used for associated records.

Conclusions

This report summarizes the results from the 2007/08 informal study of repository fees charged for archeological collections across the United States. It also examines some significant trends and issues. These include changes in the types of fees charged, the nationwide distribution of the current fees charged, the criteria used to determine the fee structures, and the increase in the lack of curation space.

There continues to be inadequate funding available to support the long-term care and management of archeological collections. This includes the professional staff to provide the necessary services, and the space to house the collections and make them accessible across the United States. Therefore, both the collection owners and the repositories benefit when an appropriate fee is charged and paid for curation services. The public, including researchers, educators, students, and culturally-affiliated people, also benefit when the collections are in good condition and are curated in a protected place for ongoing access and use.

If you would like to provide comments on this report or contribute new data, please contact Terry Childs.

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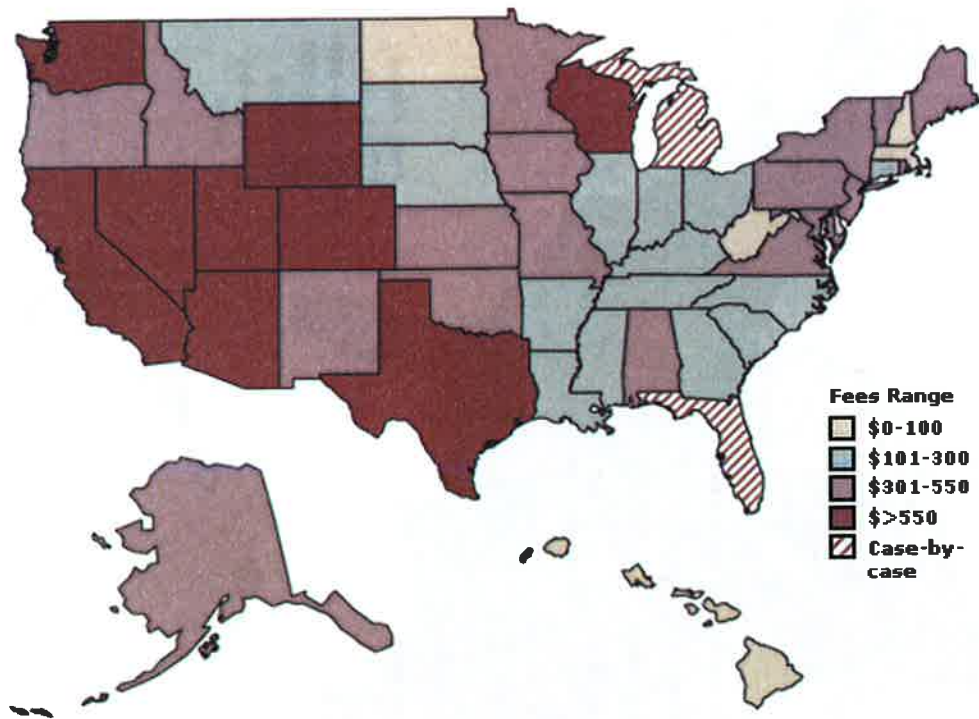
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Map 1. Variation in in-perpetuity fees for 2007/08



Map 2. Range of fees charged in 2007/08

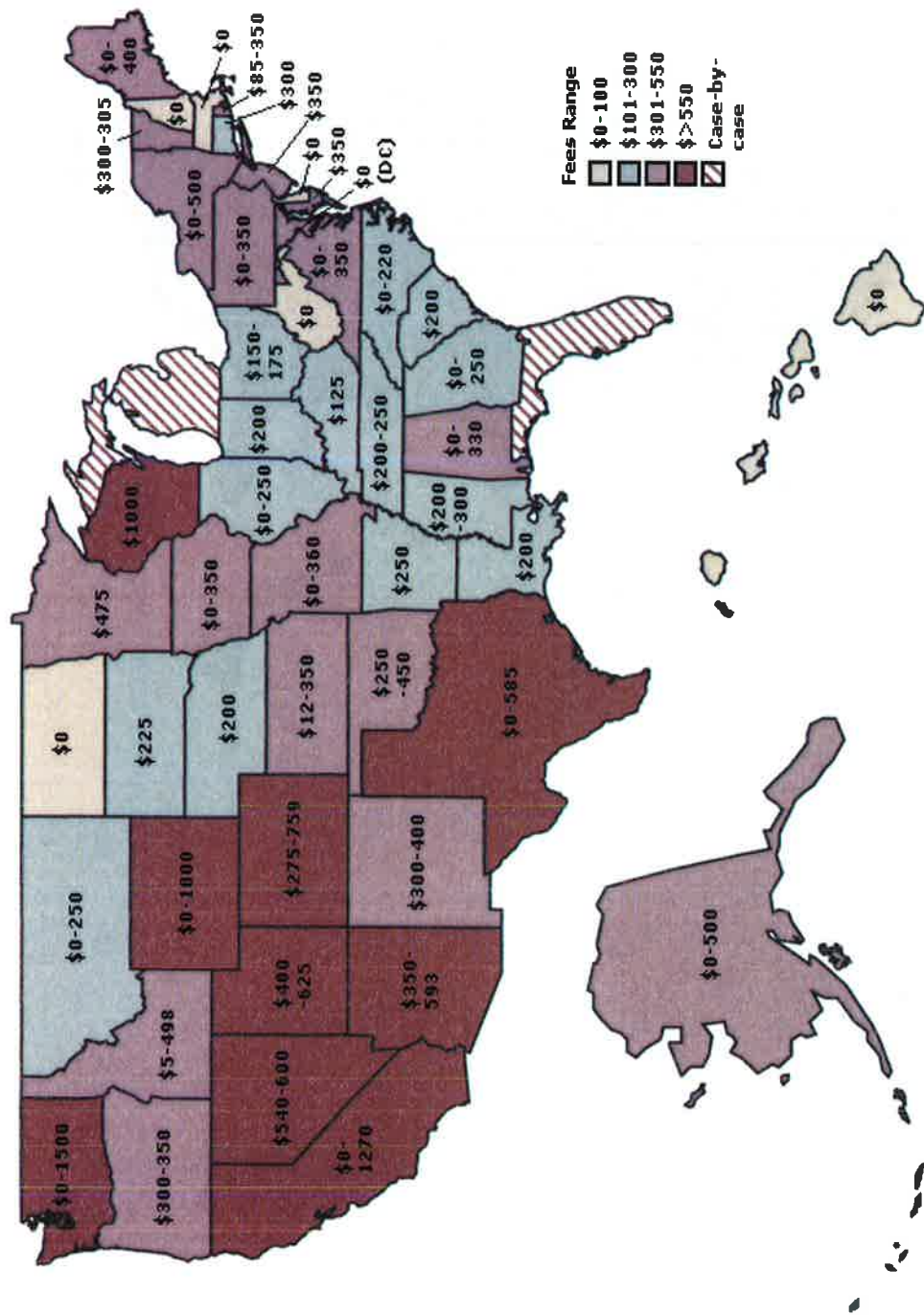


Figure 1
Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
Alabama	\$330 / cf / 1-time / In-perpetuity	\$175 / cf / Maintenance / 1-time \$90 / cf / Processing / 1-time \$6.21 / cf / Annual / Increase 5% yearly	\$150 / cf / 1-time \$5.36 / cf / annual \$400 / cf / rehab	1993
Alaska	Case-by-case	Not contacted.	Not contacted.	1990s
	\$500 / cf / 1-time / In-perpetuity	Not contacted.	Not contacted.	1998
	\$500 / cf / 1-time / In-perpetuity	\$450 / cf / Curation / 1-time \$10 / cf / Temporary / monthly \$20 / hr / Processing if not shelf-ready / 1-time	\$45 / box / 1-time \$20 / box / processing \$145 / box / annual	2002
	\$200-500 / cf / 1-time / In-perpetuity / Negotiable	Not contacted.	Not contacted.	Late 1990s
Arizona	\$593 / box / 1-time / In-perpetuity \$225 / box / registration fee \$30 / gb	\$27 / fpd plus \$280; \$200 / cf \$10 / individual artifact	\$8.50 / fpd plus \$140 \$33.75 / fpd plus \$260 / 1-time 8% increase assessed every year after 2 years.	1970s
	\$350 / box / 1-time / In-perpetuity \$35 / Individual cataloged artifact	\$250 / lot / bag / Bulk cataloged / 1-time \$25 / Individual cataloged artifact	\$200 / cf / 1-time \$15 / individual artifacts	1990-91
	Not at the moment, re-examining possibility.	\$155 / cf / 1-time	Not contacted.	1980s
	\$20 / fpd \$100 / Minimum / 1-time	Not contacted. However, was \$15 / fpd.	Not contacted.	1993
Arkansas	Combined with another repository.	Combined with another repository.	\$98 / (26x16x3) box / 1-time	1986
	\$250 / cf / 1-time / In-perpetuity	\$250 / cf / 1-time \$125 / Minimum / 1-time	\$185 / cf / 1-time	1980
California	\$1000 / cf / 1-time / In-perpetuity / 1st 5 boxes \$850 / box / next 5 boxes \$700 / box / next 10 boxes \$600 / box / 21-40 boxes \$500 (min) / box / 41+ boxes	\$1000 / box - \$500 / box / 1-time for 1st 5 boxes w/ descending rate	\$1000 / box first 5 boxes, decreases w/ increased number of boxes	1995
	\$800 / box / 1-time / In-perpetuity	\$1500 / cf / 1-time \$1000 / cf / oversized / 1-time	\$750 / box / 1-time	1988
	\$250 / box / Processing new collections / 1-time \$10 / hr / Processing over 20 hrs \$750 / box / Curation of new & currently accessioned collections / 1-time \$50 / hr / Staff member	\$250 / box / Processing new collections / 1-time \$750 / box / Curation of new & currently accessioned collections / 1-time \$200 / box / Revitalization / 1-time \$1000 / cf / Processing and curation of oversized materials / 1-time	\$1000 / cf / 1-time In the middle of revising fee structure.	1994
	\$400 / box / Processing & curation / 1-time	\$400 / cf / Processing & curation / 1-time	Not contacted.	1990s
	\$700 / box / 1-time / In-perpetuity	\$600 / box / 1-time \$150 / box & \$50 / box / 5-year renewable contract/annual \$250 / box / Revitalization \$150 / box / NAGPRA	\$600 / box / 1-time \$150 / box / 1st year of 5 year contract & \$50 / annual thereafter \$250 / box / revitalization \$150 / box / NAGPRA	1998
	\$750 / box / 1-time / In-perpetuity	\$750 / box / 1-time	\$500 / box / 1-time	1983
	\$1000 / box / 1-time / In-perpetuity	\$500 / box / 1-time	\$500 / box / 1-time	1982
	Case-by-case	Not contacted.	Not contacted.	Long time (Unknown)
	\$72.50 / box or tray / 1-time / In-perpetuity \$7.25 / box (Storage container) \$21.75 / tray (Storage container)	Not contacted.	Not contacted.	1980s
	\$600 / cf / 1-time / In-perpetuity	Not contacted.	Not contacted.	1980s
\$150 / cf / 1-time / In-perpetuity	Not contacted.	Not contacted.	2000	
\$1200 / cf / 1-time / In-perpetuity \$70 / cf / Annual maintenance	Not contacted.	Not contacted.	2008	

Figure 1
Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
Colorado	\$500 / cf / 1-time / In-perpetuity	\$125 / box / 1-time \$10 / isolated find \$20 / hr / Bring up to standards \$10 / cf / Temporary curation	\$125 / box / 1-time \$10 / isolated find \$20 / hr to bring up to standards \$10 / cf temporary curation	1996
	\$275 / box / 1-time / In-perpetuity \$175 / half-box / 1-time / In-perpetuity \$100 / qtr-box / 1-time / In-perpetuity \$50 / less than qtr-box / 1-time / In-perpetuity Oversized items are billed based on actual space taken	\$275 / box / 1-time \$175 / half-box / 1-time \$100 / qtr-box / 1-time \$50 / less than qtr-box / 1-time Oversized items are billed based on actual space taken	\$275 / box / 1-time \$175 / half-box / 1-time \$100 / quarter-box / 1-time \$50 / less than quarter-box / 1-time	1997
	\$300 / cf / 1-time / In-perpetuity	\$300 / cf / 1-time	\$230 / cf - \$60 / quarter-box / 1-time	1970s
	\$314 / Accessioning fee / 1-time / In-perpetuity \$445 / Hollinger box / 1-time / In-perpetuity	Not contacted.	Not contacted.	2002-3
Connecticut	\$300 / (12x12x15 in.) box / 1-time / In-perpetuity	\$200 / cf / 1-time	\$200 / cf / 1-time	1989
Delaware	No fees, but soon.	No fees.	No fees.	N/A
District of Columbia	No fees, but soon.	No fees.	No fees.	N/A
Florida	\$1500 / collection / Museum approximates how much cf the collection will need	\$200 / cf / 1-time Increased 5% annually Museum approximates how much cf the collection will need and charges by cf	\$150 / cf / 1-time Increased 10% annually	1980s
Georgia	\$250 / box / 1-time / In-perpetuity \$20 / cf / Annual	\$250 / box w/ 2 box minimum / 1-time \$20 / cf per year w/ 2-box minimum / Negotiated for a period up to 10 years total of \$200 / cf The term contract is renewable	\$200 / box / 10-year contract, 2-box minimum	1989
	\$175 / Banker's box / 1-time / In-perpetuity	\$175 / cf / 1-time \$25 / cf / Processing	\$200 / cf / 1-time	1988
Hawaii	No fees, but soon.	No established fee.	\$65 / box, but never imposed.	N/A
Idaho	\$31.48 / hr / 8 objects / Processing / 1-time 1-time fee in-perpetuity / annual fee in discussion	\$30.55 / hr / 8 objects / Processing / 1-time 1-time fee in-perpetuity / annual fee in discussion	\$30.85 / 12 artifacts / 1-time	1980s
	\$498 / cf / 1-time / In-perpetuity \$2.32 / object / In-perpetuity	\$498 / cf / 1-time \$2.32 / object Will negotiate if guidelines met & Access catalog disk submitted.	\$367 / cf / 1-time processing	1987
	\$5 / cf / Annual	\$96 / 100 bags / 1-time processing and/or entry, plus maintenance.	Not contacted.	2000
Illinois	\$250 / cf / 1-time / In-perpetuity	\$250 / cf / 1-time	\$250 / cf / 1-time	1980s
Indiana	Contacted, couldn't answer questions.	\$300 / box w/ 1 exception / 1-time Fees increase \$25 / year except for one 10-year contract remaining at \$125 / box.	\$175 / cf / 10-year periods	1979
	\$200 / cf / 1-time / In-perpetuity	\$200 / cf / 1-time Processing negotiable	Not contacted.	1991
Iowa	\$350 / cf / 1-time/ In-perpetuity / Minimum of .01 cf \$30 / Per Accession / Site \$35 / hr / Preparation fee if not curation ready.	\$300 / cf \$20 / Per Accession / Site \$25 / hr / Preparation fee if not curation ready.	\$250 / cf / 1-time processing	1986

Figure 1
Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
Kansas	\$350 / cf / 1-time / In-perpetuity	\$75 / box / 1-time	\$75 / box up to 3 boxes \$20 / box for 4 or more.	1982
	\$300 / cf / 1-time / In-perpetuity	\$200 / cf / 1-time \$30 / hr / Processing (if materials not shelf-ready. Charge includes staff time and archival supplies.) \$7.30 / cf / Annual maintenance.	\$200 / cf / 1-time	1991-2
	No longer collecting.	Contacted, no response.	Case-by-case.	Unknown
	\$12 / cf / Annual / 5-year contract	Contacted, no response.	No fees, considering.	2005
Kentucky	\$125 / cf / 1-time / In-perpetuity	\$125 / cf / 1-time	\$125 / cf / 1-time Processing fee is not a set flat fee, based on students time & materials expense.	1980s
	\$125 / cf / 1-time / In-perpetuity	\$125 / cf / 1-time \$25 / < 1cf / 1-time	\$125 / cf / 1-time Plan to switch to a multi-year fee schedule	1989
Louisiana	\$200 / cf / 1-time (Initial processing fee of \$65 plus long-term storage of \$135) \$40 / cf / Annual fee (Federal)	\$200 / cf / 1-time (Initial processing fee of \$65 plus long-term storage of \$135) \$200 / Oversized objects fee for every 30 lbs \$40 / cf / Annual fee (COE [long-term fee waived])	\$200 / cf long-term (\$65 / cf processing & \$135 / cf long-term)	1994
Maine	\$350 / Hollinger box / 1-time / In-perpetuity \$75 / < box / Minimum \$25 / hr / Preparation	\$350 / 1.16 cf / 1-time \$75 / < 1.16cf / Minimum \$25 / hr / Preparation Varies / Conservation (fee is negotiated prior to acceptance)	\$100 / box processing \$10 / annual (can negotiate lump sum)	1998
	\$300-360 / box / 1-time / In-perpetuity Negotiated based on project.	No fees.	Not contacted.	2004
	\$400 / box / 1-time / In-perpetuity	Not contacted.	Not contacted.	2004
Maryland	\$350 / 1.3 cf box / 1-time / In-perpetuity	\$150 / box / 1-time (12 year loan after which time the state assumes cost) Unknown fee for federal agencies / Annual fee based on processing up to standards, full physical inventories, database entry, write reports, conservation upon request.	\$150 / box / 1-time (12 years term) Undetermined fee for short-term loans (less than 10 years).	1996
Massachusetts	No fees.	No fees.	No fees.	N/A
Michigan	Case-by-case.	No fees.	No fees. A state agency which needs state legislation to charge fees.	2007
Minnesota	\$285 / box / 1-time / In-perpetuity \$75 / Processing \$115 / Indirect costs / deposit	No fees. Will review possibility.	No fees. Thinking about it.	2005
Mississippi	\$250 / cf (and fraction thereof) / 1-time / In-perpetuity \$50 / Processing All contracts renegotiated after 5 years.	No fees for 106 collections Unknown what was charged, if anything, for non-106 collections.	No fees.	2008
	\$200 / cf / 1-time / In-perpetuity	\$200 / box (~1.1cf), plus / 1-time for small collections for private contractors \$22 / box / 1-time fee to put all materials received into Cobb's boxes (30-year COE contract, 10-year term limits for other agencies).	Contacted, no response.	1984-5
	\$160 / (21x21x3 in.) box / 1-time / In-perpetuity	\$160 / 3/4 cf / 1-time fee if shelf-ready (CRM) \$20 / hr / Hourly fee if not shelf-ready \$100 / box / Annual fee for federal agencies	Not contacted.	1994

Figure 1
Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
Missouri	No dollar amount, 1-time curation fees are based on the Center's project cost for a project: Phase I – 3% of project cost Phase II- 4% of project cost Phase III- 5% of project cost	No dollar amount, 1-time curation fees are based on the Center's project cost for a project: Phase I – 3% of project cost Phase II- 4% of project cost Phase III- 5% of project cost	No dollar amount, 1-time curation fees are based on the Center's project cost for a project: Phase I – 3% of project cost Phase II- 4% of project cost Phase III- 5% of project cost	1982
	\$340 / shelf-ready box / 1-time / In-perpetuity \$20 / site	\$340 / box / 1-time (shelf-ready) \$85 / qtr box / Minimum \$20 / site / To compensate for small collections.	\$360 / box shelf-ready \$400 / box not shelf-ready \$35 / small box shelf-ready \$50 / small box not shelf-ready	1978
Montana	\$250 / cf / 1-time / In-perpetuity \$10-25 / Isolated find	\$250 / cf / 1-time \$20 / hr / Processing \$10 / cf / Temporary	\$150 / cf / 1-time	1992
Nebraska	No longer collecting from outside.	\$216 / box / 1-time / In-perpetuity \$6.75 / box / Annual \$30 / Minimum Rehabilitation / 1-time fee of \$216 / box & annual \$6.75 / box	Not contacted.	2000
	\$200 / (25x19x5 in.) box / 1-time / In-perpetuity	\$100 / box / 1-time / In-perpetuity	\$100 / box / 1-time	Unknown
Nevada	\$540 / cf / 1-time / In-perpetuity	\$1080 / cf / 1-time / In-perpetuity \$540 / cf / Collection donated or >60/cf \$50 / cf Human remains (temporary curation) No reduced rates for bulk samples / large ground stone. Revising fee structure.	\$1080 / cf / 1-time \$540 / cf normal rate for CRM firms. Reduced rates for bulk samples/large ground stone. \$50 / human remains (temporary curation). \$11 / hr processing if needed.	1979
	\$600 / cf / 1-time / In-perpetuity	No fees.	Not contacted.	2006
New Hampshire	No fees. Considering possibility of a 1-time processing fee and an annual fee.	No fees.	Not contacted.	N/A
	Closed.	Considering possibility of a 1-time processing fee and an annual fee.	Not contacted.	N/A
New Jersey	\$350 / cf / 1-time / In-perpetuity	No fees.	No fees.	2008
New Mexico	\$440 / cf / 1-time / In-perpetuity 2009 increase to \$485 / cf	\$400 / cf / 1-time entry fee (Increase 10% biannually) \$44 / cf / Processing fee (case by case basis) \$25 / cf / Annual fee (not charged until collection has been housed a full calendar year.) \$225 / cf / Fees for 2 federal agencies until 2004.	\$225 / cf / 1-time entry \$21 / cf / annual maintenance (increased to \$25 / cf / annual in 1999) \$12.80 / hr processing fee.	1984
	\$234 / cf / 1-time / In-perpetuity \$66 / cf / Processing \$39 / Annual \$17 / Deaccessioning \$2000/ Non-botanical	\$325 / cf / Unprocessed entry fee \$100 / cf / Processed entry fee \$50 / Annual \$30/ cf (Increased 700% since 1970s) / Exit fee for deaccessioned collections.	Contacted, no response.	1970s
	\$400 / cf / 1-time / In-perpetuity \$400 / cf / Oversized object \$100 / Unfoldable big piece of paper	\$250 / 0.6 cf or 1 oversize object / 1-time No dollar amount provided / Annual from COE	Not contacted.	1980s
	Case-by-case 1 Federal agency paying annual / No dollar amount Examining 1-time fee in-perpetuity	Not contacted.	Contacted, no response.	2000
	Case-by-case.	Not contacted.	Not contacted.	2006
New York	\$100-200 / (6x12x18 in.) box / 1-time / In-perpetuity	No fees. In-house collections only.	Not contacted.	After 1988
	\$200-500 / cf / 1-time / In-perpetuity / Depending on processing	\$200 / cf / 1-time	Not contacted.	1990
	Case-by-case.	Not contacted.	Not contacted.	2002

Figure 1
Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
North Carolina	\$220 / Hollinger box / 1-time / In-perpetuity \$35 / hr / Technical service fee	\$200 / cf / 1-time No dollar amount provided. Processing fees optional at request of submitting agency, keyed to labor & direct costs to rehab collections / records. No dollar amount provided. Annual fee possible for certain state or federal agencies.	Not contacted.	1995
North Dakota	No fees, but examining possibility.	No fees, considering possibility.	No fees. Plan to in the future.	N/A
Ohio	\$150-175 / cf and data entry / 1-time / In-perpetuity	\$130 / cf / 1-time Additional fees for data entry, so average cost is \$150 / cf / data entry fee	Not contacted.	1991
Oklahoma	Government Agencies: \$242.77 / month / Staff Support Personnel \$1.33 / sq.ft. / month / Operations fee \$0.04 / cf / month / Space usage fee Non-Government Agencies: \$85.72 / 20 boxes / Processing \$242.70 / cf / 1-time / In-perpetuity	\$60 / cf / 1-time \$35 / minimum / Currently working on revising (increasing) fees. Fee structure will likely be changed from one-time to an annual fee & may differ between agencies. Federal agencies with housed collections have not been charged any fees to date.	\$60 / cf / 1-time Processing \$35 / minimum	1981
	\$350 / cf / 1-time / In-perpetuity \$100 / Processing Larger collections are negotiable.	Not contacted.	Contacted, no response.	1995
Oregon	\$350 / cf / 1-time / In-perpetuity	\$350 / cf / 1-time	\$250 / cf / 1-time Additional hourly fee to bring collection up to standards.	1980
	\$350 / cf / 1-time / In-perpetuity	Contacted, no response.	Not contacted.	1998-9
	\$300 / cf / 1-time / In-perpetuity	Not contacted.	Not contacted.	1995
Pennsylvania	\$350 / cf / 1-time / In-perpetuity	\$250 / cf / 1-time / Minimum Discussing raising fees.	\$250 / cf / 1-time	1991
Rhode Island	\$85 / box / 1-time / In-perpetuity (If generated by own firm) \$350 / box / 1-time / In-perpetuity (Outside firm)	\$75 / box / 1-time	\$50 / box / 1-time	1982
South Carolina	\$200 / cf / 1-time / In-perpetuity	\$68 / cf / 1-time	\$68 / cf / 1-time	1980s
South Dakota	\$225 / cf / 1-time / In-perpetuity	\$30 - \$225 / box (depends on box size) / 1-time \$30 / minimum / Processing fee w/ \$25 for each hour after first hour.	\$24 - \$180 / box / 1-time	1980
Tennessee	\$250 / cf / 1-time / In-perpetuity	\$150 / cf / 1-time	Case-by case.	1996
	\$200 / box / 1-time / In-perpetuity Only estimate by 1/2 box	\$150 / cf / 1-time for shelf ready Varies / Costs for preparation / remediation on case-by-case.	Case-by case.	1996

Figure 1
Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
Texas	No longer accepting from outside.	No longer charge fees.	\$301.80 / cf / 1-time	1980s
	\$250 / Minimum \$333.33 / 1/3 shelf 2 curation boxes (14.875 x 10.5 x 5.25 in.) / 1-time / In-perpetuity \$666.66 / 2/3 shelf 4 curation boxes \$1000 / shelf 6 curation boxes SPECIAL COLLECTIONS: \$200 / Minimum \$250 / 1/4 shelf 1 curation box (20x16x5 in.) \$500 / 1/2 shelf 2 curation boxes \$750 / 3/4 shelf 3 curation boxes \$1000 / 1 shelf 4 curation boxes	Not contacted.	Not contacted.	1997
	\$585 / box / 1-time / In-perpetuity \$55 / box / Processing	\$585 / cf / 1-time (Minimum initial processing fee w/ built-in long-term maintenance) Unknown dollar amount / Deaccessioning	\$585 / cf / 1-time (50 years)	1991
	\$480 / 1/3 shelf (1 curation box, 18"x 11"x 6") / 1-time / In-perpetuity \$960 / 2/3 shelf (2 curation boxes) \$1440 / 1 shelf (3 curation boxes)	\$1140 / drawer / 1-time (Charges per drawer or per shelf [3 boxes])	\$560-700 / drawer / 1-time	Early 1970s
Utah	\$2000-4000 / Annual / Collection No longer accepting from outside.	Curation services suspended Jan. 2002, except for Office of Public Archaeology (OPA) and Dept. of Anthropology Field School collections due to shortage of space.	\$300 / box / 1-time	1987
	\$75 / Annual agreement / Even w/o deposit \$350 / cf / 1-time / In-perpetuity (Closed for now / will raise if re-open.)	No fees	\$250 / cf / 1-time \$50 / curation agreement	1987
	\$390 / cf / 1-time / In-perpetuity \$625 / cf / 1-time / In-perpetuity (Hazardous collection) \$25 / cf / Annual / Under contract	\$350 / cf shelf-ready / 1-time No dollar amount given / Estimated cost if not per guidelines / processing fee.	Not contacted	1991
	\$424.71 / 1.3 cf / 1-time / In-perpetuity \$50 / Processing fee \$467.18 / 1-time Jan. 2009.	\$297 / box / 1-time, includes: \$70 processing \$200 long-term care \$27 overhead	\$295 / cf / 1-time	1987
	\$400 / cf / 1-time / In-perpetuity	\$400 / cf / 1-time \$50 / Annual curation agreement \$25 / cf / Annual \$5,000 / Annual / BLM & USFS	Not contacted.	1987
	\$400 / cf / 1-time / In-perpetuity	Not contacted.	Not contacted.	1980s
Vermont	\$305 / box / 1-time / In-perpetuity	\$162 / box / 1-time. Figured at \$100 / box + \$30 / hr for two hours to inspect each box & \$2 / box to cover transfer of box to a future facility.	\$37.63 / box / 1-time	1979
	\$300 / box / 1-time / In-perpetuity	Didn't exist.	Didn't exist.	2006
Virginia	\$350 / box / 1-time / In-perpetuity \$20 / hr / Processing	Not contacted. However, was \$150 / box	Didn't exist.	2002
	\$227 / box / 1-time / In-perpetuity	\$227 / box / 1-time	\$227 / box / 1-time	1993
	\$350 / box / 1-time / In-perpetuity	\$150 / box / 1-time	\$75 / box / 1-time	Mid 1980-90s

Archeological Artifacts Curation Fees Table (as of July 2008)

Repository State	2007/8 Artifact Fee / Structure	2002 Artifact Fee / Structure	1997/98 Artifact Fee / Structure	Year Fees Instituted
Washington	\$500 / cf / 1-time / In-perpetuity \$6.50 / cf / Annual	\$300 / cf up to \$25 / cf / 1-time \$50 / cf / Accession (shelf-ready) \$5 / cf w/ minimum \$25 / yr / Annual for long-term curation \$5 / month / Monthly fees for short-term curation	\$300 / cf up to \$25 / cf / 1-time \$50 / accession fee (shelf-ready) \$5 / cf / annual, long-term \$5 / month, short-term	1996-7
	Federal / Held in trust: \$300 / box / 1-time / In-perpetuity \$65 / cf / Annual Not inducted to repository: \$1500 / cf / 1-time / In-perpetuity	\$300 / cf / Incoming \$65 / cf / Annual \$1500 / cf / 1-time in perpetuity endowment No dollar amount provided / Hourly rate to re-house collection and long-term fee	Not contacted.	1989
West Virginia	No fees, but examining possibility.	No fees.	No fees.	N/A
Wisconsin	\$1000 / cf / 1-time / In-perpetuity, plus \$54 / Cost of labor \$10 / Fringe benefits \$25 / Materials	\$300 / box, plus \$54 Labor \$10 Fringe benefits (personnel related expense) \$25 Supplies \$179 Indirect costs (physical plant maintenance & contract administration)	Not contacted.	1980s
	No longer accepting.	\$70 / cf / 1-time No current standard fee structure as have not accepted any new curation agreements w/ federal agencies since 1997. Not accepting new materials for which it cannot gain title. If changes in the future will possibly be a renewable fee structure.	\$70 / cf / 1-time	1980s
Wyoming	\$1000 / (12 x 16 x 10.5 in.) box / 1-time / In-perpetuity \$500 / 1/2-1/4 box \$250 / 1/4 >	\$1,000 / 0.35-1.08 cf / 1-time \$500 / box (0.35 cf) minimum / Minimum / 1-time	\$50 / half-box - \$150 / box / 1-time \$20.326 / hr overhead	1980s

Figure 2
Associated Records Curation Fees Table (as of July 2008)

Repository State	2007/8 Associated Documentation Fee / Structure	2002 Associated Documentation Fees / Structure	1997/98 Associated Documentation Fee / Structure	Year Fees Instituted
Alabama	\$330 / lf / 1-time / In-perpetuity \$0.30 / photographic image (regardless of media)	\$175 / cf / 1-time	\$150 / cf / 1-time	Prior to 1997/8
Alaska	Included in case-by-case fee	Not contacted	Not contacted	
	No fee for small collections	Not contacted	Not contacted	
	\$500 / lf / 1-time / In-perpetuity			
	Included in \$500 / 1-time artifact fee	\$450 / cf / 1-time	\$10 / li / annual	Prior to 1997/8
	\$50-500 / cf / 1-time / In-perpetuity	Not contacted	Not contacted	
Arizona	Included in \$225 / 1-time / Registration fee \$30 / gb / 1-time / In-perpetuity	\$17 / fpd / 1-time \$50 / minimum	\$8.50 / fpd / 1-time	Prior to 1989
	\$350 / box / 1-time / In-perpetuity	\$3 / image / 1-time processing	Included in \$200 / cf / 1-time artifact fee	
	This will be part of the new fee structure.	Included in \$155 / cf / 1-time artifact fee	Not contacted	
	Included in \$20 / fpd fee	Not contacted	Not contacted	
Arkansas	Combined with another repository.	Combined with another repository.	\$10.00 / li / 1-time \$10.00 minimum	1989
	\$15 / li / 1-time / In-perpetuity \$20 / li / minimum	\$15 / li / 1-time \$20 / li / minimum	\$12.50 / li / 1-time \$15.00 minimum	Increased in 1999
California	Included in \$<1000 / cf / 1-time artifact fee	\$1000 / box - \$500 / box / 1-time for 1st 5 boxes w/ descending rate	\$1000 / box first 5 boxes, decreases w/ increased number of boxes	Prior to 1997/8
	Included in \$800 / box / 1-time artifact fee	Included in \$1500 / box / 1-time artifact fee	\$750 / box / 1-time	Prior to 1997/8
	\$20 / hr / Processing \$0.25 / Page / Copying Otherwise included	Included in \$750+ / cf / 1-time artifact fee	Included in \$1000 / cf / 1-time artifact fee In the middle of revising fee structure.	
	Included in \$400 / cf / 1-time artifact fee	\$400 / cf processing & curation / 1-time	Not contacted	
	\$700 / box / 1-time / In-perpetuity	\$600 / box / 1-time \$150 / box / 1st year of 5 year contract & \$50 / annual thereafter	\$600 / box / 1-time \$150 / box / 1st year of 5 year contract & \$50 / annual thereafter	Prior to 1997/8
	Included in \$750 / box / 1-time artifact fee	\$750 / box / 1-time	\$500 / box / 1-time	Prior to 1997/8
	\$1000 / box / 1-time / In-perpetuity	\$500 / box / 1-time	\$500 / box / 1-time	Prior to 1997/8
	Included in case-by-case fee	Not contacted	Not contacted	
	\$72.50 / 1/8 file / File cabinet	Not contacted	Not contacted	
	Included in \$600 / cf / 1-time artifact fee	Not contacted	Not contacted	
Included in \$150 / cf / 1-time artifact fee	Not contacted	Not contacted		
Included in \$1200 / cf / 1-time artifact fee	Not contacted	Not contacted		
Colorado	\$250 / lf / 1-time / In-perpetuity	\$125 / cf / 1-time	\$125 / cf / 1-time	Prior to 1997/8
	Included in \$275-\$50 / Descending box size / 1-time artifact fee	Included in \$275-\$50 / Descending box size / 1-time artifact fee	\$275-\$50 / Descending box size / 1-time	Prior to 1997/8
	\$20 / lf / 1-time / In-perpetuity \$300 / box / 1-time / In-perpetuity (If there is enough to fill a box)	\$300 / cf / 1-time	\$230-\$60 / descending box size / 1-time	Prior to 1997/8
	\$20-46 / lf / 1-time - In-perpetuity Digital files are charged case-by-case.	Not contacted	Not contacted	
Connecticut	Included in \$300 / box / 1-time artifact fee	Included in \$200 / cf / 1-time artifact fee	Included in \$200 / cf / 1-time artifact fee	Prior to 1997/8
Delaware	No fees	No fees	No fees	
District of Columbia	No fees	No fees	No fees	
Florida	Included in \$1500 / collection fee	Included in \$200 / cf / 1-time artifact fee	\$150 / cf / 1-time	Prior to 1997/8
Georgia	Included in two box minimum, of artifacts	Included in \$250 / box / 1-time artifact fee Negotiated for a period up to 10 years total of \$200 / cf	\$200 / box / 10-year contract	Prior to 1997/8
	\$175 / Bankers box / 1-time / In-perpetuity, soon to be \$200	\$175 / cf / 1-time No additional processing fee	\$200 / cf / 1-time	Prior to 1997/8
Hawaii	No fees	No fees	No fees / (Included in \$65 / box / 1-time artifact fee)	

Figure 2
Associated Records Curation Fees Table (as of July 2008)

Repository State	2007/8 Associated Documentation Fee / Structure	2002 Associated Documentation Fees / Structure	1997/98 Associated Documentation Fee / Structure	Year Fees Instituted
Idaho	Included in \$31.48 / hr / Processing fee	Included in \$30.55 / hr / 1-time artifact fee Fee for documents has increased ~\$.75 / hr	Included in \$30.85 / 12 artifacts / 1-time fee	
	Included in \$498 / cf / 1-time artifact fee	Included in \$498 / cf / 1-time artifact fee	Included in \$367 / cf / 1-time artifact fee	
	\$5 / cf / year	Included in \$96 / 100 bags / 1-time artifact fee	Not contacted	Prior to 2002
Illinois	Included in \$250 / cf / 1-time artifact fee	No fees / (Included in \$250 / cf / 1-time artifact fee)	No fees / (Included in \$250 / box / 1-time artifact fee)	
Indiana	Couldn't respond due to extenuating circumstances.	Included in \$300 / box / 1-time artifact fee Considered part of entire collection and measured by box not linear feet.	Included in \$175 / cf / 10-year period artifact fee	
	Included in \$200 / cf / 1-time artifact fee	Included in \$200 / cf / 1-time artifact fee	Not contacted	
Iowa	\$30 / Accessioned collection \$150 / li / 1-time / In-perpetuity \$35 / hr / Processing	Included in \$300 / cf / 1-time artifact fee	Included in \$250 / cf / 1-time artifact fee	Prior to 2007/8
Kansas	Included in \$350 / cf / 1-time artifact fee	No fees (Included in \$75 / cf / 1-time artifact fee)	No fees / (Included in \$20-75 / cf / 1-time artifact fee)	
	Included in \$300 / cf / 1-time artifact fee	\$200 / cf / 1-time \$30 / hr processing if not "shelf-ready" \$7.30 / cf / annual maintenance	Included in \$200 / cf / 1-time artifact fee	
	No longer collecting.	Contacted, no response	Included in case-by-case fee \$100 / hr / to input and manage the data for information that is normally not kept	
	Included in \$12 / cf / year	Contacted, no response	No fees	
Kentucky	Included in \$125 / cf / 1-time artifact fee	\$125 / cf / 1-time	\$125 / cf / 1-time	
	Included in \$125 / cf / 1-time artifact fee	Included in \$125 / cf / 1-time artifact fee	\$125 / cf / 1-time	
Louisiana	Included in \$200 / cf / 1-time artifact fee	\$200 / cf / 1-time processing and long-term storage	Included in \$200 / cf / 1-time artifact fee	
Maine	\$20 / li / 1-time / In-perpetuity \$25 / hr / Processing	\$20 / li / 1-time	Included in \$100 / box / 1-time artifacts fee	Prior to 2002
	Included in \$300-360 / box / 1-time artifact fee	No fees	Not contacted	
	\$400 / box / 1-time / In-perpetuity	Not contacted	Not contacted	
Maryland	Included in \$350 / box / 1-time artifact fee	\$150 / box / 1-time	\$150 / box / 1-time (12 year term)	
Massachusetts	No fees	No fees	No fees	
Michigan	Included in case-by-case fee	No fees	No fees	
Minnesota	\$75 / Set of documentation	No fees	No fees	Prior to 2007/8
	\$250 / cf / 1-time / In-perpetuity	No fees	No fees.	Prior to 2007/8
	\$200 / cf / 1-time / In-perpetuity	\$200 / box (~1.1cf), plus / 1-time for small collections for private contractors \$22 / box / 1-time fee to put all materials received into Cobb's boxes (30-year COE contract, 10-year term limits for other agencies).	Contacted, no response.	Prior to 2002
	\$15 / 6 li / 1-time / In-perpetuity	\$15 / 1/2 lf / minimum (has never been charged)	Not contacted	Prior to 2002
Missouri	Included in artifact fee / 1-time, no dollar amount provided: Phase I - 3% of project cost Phase II- 4% of project cost Phase III- 5% of project cost	Included in artifact fee / 1-time, no dollar amount provided: Phase I - 3% of project cost Phase II- 4% of project cost Phase III- 5% of project cost	Included in artifact fee / 1-time, no dollar amount provided: Phase I - 3% of project cost Phase II- 4% of project cost Phase III- 5% of project cost	Prior to 1997/8
	Included in \$340 / box / 1-time artifact fee	Included in \$85 / qtr box-\$340 / box artifact fee	Included in \$35-400 / box / 1-time artifact fee	
Montana	\$125 / lf / 1-time	\$120 / lf / 1-time	No fees / (Included in \$150 / cf / 1-time artifact fee)	Prior to 2002
Nebraska	No longer collecting.	\$216 / box/ 1-time -Subject to separate contracted agreement. Labor fees include \$30/hr (collections mgr) & \$21/hr (preparator).	Not contacted	
	Included in \$200 / box / 1-time artifact fee	No fees (Included in \$100 / box / 1-time artifact fee)	No fees / (Included in \$100 / box / 1-time artifact fee)	
Nevada	Included in \$540 / cf / 1-time artifact fee	\$1080 / cf / 1-time No fee for small reports / catalogs	\$1080 / cf / 1-time No fee for small reports / catalogs	
	Included in \$600 / cf / 1-time artifact fee	No fees	Not contacted	

Figure 2
Associated Records Curation Fees Table (as of July 2008)

Repository State	2007/8 Associated Documentation Fee / Structure	2002 Associated Documentation Fees / Structure	1997/98 Associated Documentation Fee / Structure	Year Fees Instituted
New Hampshire	No fees, but hitting a cost crisis.	No fees	Not contacted	
New Jersey	Included in \$350 / cf / 1-time artifact fee	No fees	No fees	
New Mexico	\$440 / lf / 1-time / In-perpetuity \$485 / lf / 1-time / In-perpetuity (2009)	\$400 / lf / 1-time entry Rates will increase 10% biannually	\$225 / cf / 1-time entry \$21 / cf / annual maintenance (if applicable)	Prior to 1997/8
	\$200 / cf / 1-time / In-perpetuity	\$325 / cf / unprocessed entry \$100 / cf / processed entry \$50 / annual \$30 / cf / exit	Contacted, no response.	Prior to 2002
	\$400 / cf / 1-time / In-perpetuity \$400 / Large, unfoldable piece of paper (ex.-Map)	\$250 / 250 pages of documents, slides/photos, or 1 bundle oversize maps / 1-time	Not contacted	Prior to 2002
	Included in case-by-case fee	Not contacted	Contacted, no response.	
	Included in case-by-case fee	Not contacted	Not contacted	
New York	Included in \$100-200 / (6x12x18 in.) box / 1-time artifact fee	No fees	Not contacted	Prior to 2007/8
	\$200-500 / cf / 1-time / In-perpetuity	\$200 / cf / 1-time	Not contacted	Prior to 2002
	Included in case-by-case fee	Not contacted	Not contacted	
North Carolina	\$220 / Hollinger box / 1-time / In-perpetuity	\$200 / cf / 1-time	Not contacted	Prior to 2002
North Dakota	No fees	No fees	No fees	
Ohio	Included in \$150-175 / cf / 1-time artifact fee	Included in \$250 / cf / 1-time artifact fee	Not contacted	
Oklahoma	\$51.30 / li / 1-time / In-perpetuity Government: \$0.04 / Month / Usage fee	\$45 / letter-size file & \$10 / minimum / 1-time Fees will increase and fee structure will change when adopted to annual fee.	\$45 / letter-size file \$10 / minimum	Increased January 2006
	Included in \$350 / cf / 1-time artifact fee	Not contacted	Contacted, no response.	Increased July 2004
Oregon	Included in \$350 / cf / 1-time artifact fee	Included in \$350 / cf / 1-time artifact fee	Included in \$250 / cf / 1-time artifact fee	
	Included in \$350 / cf / 1-time artifact fee	Contacted, no response	Not contacted	
	Included in \$300 / cf / 1-time artifact fee	Not contacted	Not contacted	
Pennsylvania	\$350 / cf / 1-time / In-perpetuity	\$250 / cf / 1-time	\$250 / cf / 1-time	
Rhode Island	Included in \$85-350 / box / 1-time / In-perpetuity	No fees (Included in \$75 / box / 1-time artifact fee)	No fees / (Included in \$50 / box / 1-time artifact fee)	
South Carolina	Included in \$200 / cf / 1-time artifact fee	\$68 / cf / 1-time	\$68 / cf / 1-time	
South Dakota	\$35 / hr / Processing	Included in \$30 / box / 1-time processing fee	\$15 / hr / Processing	Prior to 1997/8
Tennessee	Included in \$250 / cf / 1-time artifact fee	\$150 / cf / 1-time	Included in case-by-case fee	
	Included in \$200 / cf / 1-time artifact fee	\$150 / cf / 1-time	Included in case-by-case fee	
Texas	No longer accepting from outside.	No longer charging	\$301.80 / cf / 1-time	
	\$200 Minimum \$225 / 1/4 drawer (1-7 li) / 1-time / In-perpetuity \$450 / 1/2 drawer (7-14 li) \$675 / 3/4 drawer (14-21 li) \$900 / drawer (21-27 li)	Not contacted	Not contacted.	Prior to 2007/8
	\$495 / box / 1-time / In-perpetuity	\$483 / drawer / 1-time in a 5-drawer file cabinet	\$483 / drawer / 1-time in a 5-drawer file cabinet	Started 1991; increased 2000
	\$180 / 1/8 drawer (1-3.5 li) / 1-time / In-perpetuity \$360 / 1/4 drawer (3.5-7 li) \$720 / 1/2 drawer (7-14 li) \$1080 / 3/4 drawer (14-21 li) \$1440 / drawer (21-27 li)	\$135.75 - \$1086 / 1-time (Charges by drawer size increments)	Included in \$560-700 / drawer / 1-time artifact fee	Increased September 2007

Figure 2
Associated Records Curation Fees Table (as of July 2008)

Repository State	2007/8 Associated Documentation Fee / Structure	2002 Associated Documentation Fees / Structure	1997/98 Associated Documentation Fee / Structure	Year Fees Instituted	
Utah	Included in \$2000-4000 / year artifact fee	No fees, (Curation suspended.)	\$300 / box / 1-time		
	Included in \$350 / cf / 1-time artifact fee	No fees	\$250 / cf / 1-time		
	Included in \$390-625 / cf / 1-time artifact fee	Included in \$350 / cf / 1-time artifact fee	Not contacted		
	\$56.63 (\$62.30 in 2009) / 2 in. clamshell box / 1-time / In-perpetuity \$141.57 (\$155.73 in 2009) / 5 in. clamshell box / 1-time / In-perpetuity	Included in \$297 / box / 1-time artifact fee	Included in \$295 / box / 1-time artifact fee		Prior to 2007/8
	\$400 / cf / 1-time / In-perpetuity	\$400 / cf / 1-time	Not contacted		Prior to 2002
	\$400 / cf / 1-time / In-perpetuity	Not contacted	Not contacted		Prior to 2007/8
Vermont	\$300 / Banker's box / 1-time / In-perpetuity	\$162 / box / 1-time	No fees / (Included in \$37.63 / box / 1-time artifact fee)	Prior to 2002	
	Included in \$300 / box / 1-time artifact fee	Didn't exist	Didn't exist		
Virginia	\$350 / box / 1-time / In-perpetuity	Not contacted	Didn't exist	Prior to 2007/8	
	\$227 / box / 1-time / In-perpetuity	Included in \$227 / box / 1-time artifact fee	Included in \$227 / box / 1-time artifact fee	Prior to 2007/8	
	Included in \$350 / box / 1-time artifact fee	Included in \$150 / cf / 1-time artifacts fee	Included in \$75 / box / 1-time artifacts fee		
Washington	\$6.50 / li / Annually \$6 / gb / Annually	\$5 / lf / 1-time (minimum 1 lf)	\$300 / cf / 1-time	Prior to 1997/8	
	\$50 / li / 1-time / In-perpetuity	\$50 / 5 li / 1-time (minimum 1 lf) No annual fee	Not contacted	Prior to 2002	
West Virginia	No fees	No fees	No fees		
Wisconsin	\$1000 / cf / 1-time / In-perpetuity	\$300 / box / 1-time plus labor, fringe benefits, supplies, & indirect costs.	Not contacted	Prior to 2002	
	No longer accepting.	Included in \$70 / cf / 1-time artifact fee	Included in \$70 / cf / 1-time artifact fee		
Wyoming	\$<1000 / (12x16x10.5 in.) box / 1-time / In-perpetuity	Included in \$500-1000 / box / 1-time artifacts fee Fee may change when start charging for processing.	\$50 / half-box - \$150 / box / 1-time	Prior to 1997/8	

Credits

The authors of this report are S. Terry Childs, an archeologist in the Archeology Program, National Park Service, and Seth Kagan, a student at the University of Maryland and intern with the Archeology Program, NPS.

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Childs, S. Terry and Seth Kagan

2008 A Decade of Study into Repository Fees for Archeological Curation. <www.nps.gov/archeology/pubs/studies/study06a.htm> *Studies in Archeology and Ethnography* #6. Washington, DC: Archeology Program, National Park Service.

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This site was produced and is maintained in cooperation with the National Conference of State Historic Preservation Officers (NCSHPO).

Listed alphabetically below are the names of the repositories that responded to the informal questionnaire in 2007/08 in each state, although not all were used in the final compilation of data. Each institution listed below provided useful information and deserves our great thanks.

Alabama

Alabama A&M University

Alabama Department of Archives and History

University of Alabama, Office of Archaeological Research

University of Southern Alabama

Alaska

Alaska State Museum

Alutiiq Museum and Repository

Baranov Museum, Kodiak Historical Society

Museum of the Aleutians in Unalaska

University of Alaska Museum, Archaeology Department

Arizona

Amerind Foundation, Inc.

Arizona State University, Archaeological Research Institute

Museum of Northern Arizona

Pueblo Grande Museum

University of Arizona, Arizona State Museum

Arkansas

Arkansas State University Museum

University of Arkansas Collections Facility

California

Adan E. Treganza Anthropology Museum, San Francisco State University

California State Archaeological Collections Research Facility

California State University, Chico, Archaeology Laboratory

California State University, Sacramento
Fresno City College, Department of Anthropology
Maturango Museum
San Bernardino County Museum
San Diego Archaeological Center
San Diego State University
Santa Barbara Museum of Natural History
Sherman Indian Museum
Sonoma State University, Archaeological Collections Facility
University of California, Berkeley, Phoebe A. Hearst Museum of Anthropology
University of California, Los Angeles, Fowler Museum of Cultural History
University of California, Riverside, Archaeological Curation Unit
University of California, Santa Barbara, Repository of Archaeological and Ethnographic Collections

Colorado

Anasazi Heritage Museum
Colorado State University, Laboratory of Public Archaeology
Crow Canyon Archaeological Center
Denver Museum of Nature and Science
Museum Of Western Colorado
University of Colorado Museum
University of Denver, Museum of Anthropology

Connecticut

University of Connecticut, Archives and Special Collections, Thomas J. Dodd Research Center
University of Connecticut, Connecticut State Museum of Natural History

Delaware

Delaware Division of Historical and Cultural Affairs

District of Columbia

District of Columbia Office of Planning and Historic Preservation Office
George Washington University Archaeology Laboratory
Smithsonian Museum of Natural History

Florida

Ah-Tah-Thi-Ki Museum
Florida Division of Historical Resources
University of Florida, Museum of Natural History
University of West Florida, Archaeology Institute

Georgia

Columbus Museum
State University of West Georgia, Antonio J. Waring, Jr. Archaeological Laboratory
University of Georgia Museum of Natural History, Archaeological Laboratory

Hawaii

Bishop Museum, The State Museum of Natural and Cultural History
University of Hawaii at Manoa, Archaeology Laboratory

Idaho

Idaho State Historical Society, Western Repository
Idaho State University, Idaho Museum of Natural History, Eastern Repository
University of Idaho, Alfred W. Bowers Laboratory of Anthropology, Northern Repository

Illinois

Aurora University, Schingoethe Center for Native American Cultures
Illinois State Museum
Northern Illinois University
Southern Illinois University, Center for Archaeological Investigations
University of Illinois, Illinois Transportation Archaeology Program

Indiana

Indiana University, Glenn A. Black Laboratory of Archaeology,
Indiana University-Purdue University Fort Wayne Archaeology Survey

Iowa

Sanford Museum and Planetarium
University of Iowa, Office of the State Archaeologist

Kansas

Fort Hays State University
Kansas State Historical Society, Cultural Resources Division, Archaeology
University of Kansas, Museum of Anthropology
Wichita State University

Kentucky

Northern Kentucky University, Museum of Anthropology
University of Kentucky, William S. Webb Museum of Anthropology
University of Louisville, Program in Archaeology

Louisiana

Louisiana Division of Archaeology

Maine

Abbe Museum
Maine State Museum
University of Maine at Farmington, Archaeology Research Center
University of Maine at Orono

Maryland

Jefferson Patterson Park and Museum Maryland Archaeological Conservation Lab

Massachusetts

Massachusetts Commonwealth Museum
Harvard University, Peabody Museum of Archaeology and Ethnography
Philips Academy at Andover, Robert S. Peabody Museum of Archaeology
University of Massachusetts Museum of Natural History

Michigan

Michigan Historical Center

Northwestern Michigan College, Dennon Museum Center
University of Michigan
Western Michigan University

Minnesota

Minnesota Historical Society

Mississippi

Mississippi Department of Archives and History
Mississippi State University, Cobb Institute of Archaeology
University of Southern Mississippi, Anthropology Laboratory

Missouri

Southwest Missouri State University, Center for Archaeological Research
University of Missouri, Columbia, Museum of Anthropology
Washington University in St. Louis

Montana

Billings Curation Center
Montana Historical Society
Montana State University, Museum of the Rockies

Nebraska

Nebraska State Historical Society, Archaeology Division
University of Nebraska State Museum

Nevada

Desert Research Institute
Lost City Museum, Nevada Department of Cultural Affairs
Nevada State Museum
Northeastern Nevada Museum
University of Nevada, Department of Anthropology, Stead Storage Facility
University of Nevada, Las Vegas, Harry Reid Center

New Hampshire

Mount Kearsage Indian Museum
New Hampshire Archaeological Society
New Hampshire Division of Historical Resources, Department of Cultural Resources
New Hampshire Historical Society
Sargent Museum

New Jersey

New Jersey Bureau of Archaeology and Ethnology, New Jersey State Museum

New Mexico

Eastern New Mexico University, Department of Anthropology and Applied Archaeology
New Mexico Museum of Indian Arts and Culture, Laboratory of Anthropology
New Mexico State University, Museum of Anthropology
San Juan County Museum Association Salmon Ruins Museum and Research Lab
University of New Mexico, Maxwell Museum of Anthropology

New York

American Museum of Natural History
Iroquois Indian Museum
New York State Museum
New York University
State University of New York, Binghamton, Public Archaeology Facility
State University of New York, Brockport
State University of New York, Buffalo

North Carolina

North Carolina Office of State Archaeology
University of North Carolina, Research Laboratories of Archaeology
Wake Forest University, Museum of Anthropology

North Dakota

North Dakota State University
State Historical Society of North Dakota
University of North Dakota

Ohio

Cincinnati Museum Center
Cleveland Museum of Natural History

Oklahoma

Museum of the Great Plains
University of Oklahoma, Sam Noble Oklahoma Museum of Natural History

Oregon

Oregon State University
South Oregon University
University of Oregon Museum of Natural and Cultural History, State Museum of Anthropology

Pennsylvania

Bryn Mawr College
Carnegie Museum of Natural History
Indiana University of Pennsylvania
State Museum of Pennsylvania
University of Pennsylvania, Museum of Archaeology and Anthropology

Rhode Island

Haffenreffer Museum at Brown University
Public Archaeology Laboratory, Inc.
Rhode Island Department of Transportation

South Carolina

University of South Carolina Institute of Archaeology and Anthropology

South Dakota

South Dakota State Historical Society Archaeological Research Center

Tennessee

University of Memphis, C. H. Nash Museum
University of Tennessee, Anthropology Collections Facility
University of Tennessee, Frank H. McClung Museum

Texas

Houston Museum of Natural Science
Southern Methodist University
Texas A&M University, Center for Ecological Archaeology
University of Texas at Austin, Texas Archaeological Research Center
University of Texas at San Antonio, Center for Archaeological Research

Utah

College of Eastern Utah, Prehistoric Museum
Edge of the Cedars Museum
Museum of Peoples and Cultures, Brigham Young University
Southern Utah University, Archaeology Repository
University of Utah Museum of Natural History
Utah Fieldhouse of Natural History and State Park
Weber State University

Vermont

University of Vermont, Consulting Archaeology Program
Vermont Archaeology Heritage Center

Virginia

Alexandria Archaeology Museum and Storage Facility
Regional Archaeological Curation Facility at Fort Lee, Virginia
Virginia Department of Historic Resources
Virginia Museum of Natural History
Washington and Lee University, Archaeology Program
William and Mary University, Center for Archaeological Research

Washington

Eastern Washington University, Archaeological and Historical Services
University of Washington, Burke Museum of Natural History and Culture
Wanapum Heritage Center
Washington State University, Museum of Anthropology
Yakima Valley Museum

West Virginia

West Virginia Division of Culture and History

Wisconsin

University of Wisconsin, Milwaukee, Archaeological Research Laboratory
Wisconsin Historical Society

Wyoming

Buffalo Bill Historical Center
University of Wyoming
Wyoming State Museum

Appendix B

Arizona State Museum Fees

Adjusted for inflation

Prepared by:

Grand Canyon State Electric Cooperative Association

Appendix B
ASM Fees Adjusted for Inflation

2007/2008	2009	2010	2011	2012	2013	2014	2015	2016
\$818.00	\$834.36	\$851.04	\$868.06	\$885.43	\$903.14	\$921.20	\$939.62	\$958.42
\$818.00	\$818.75	\$841.03	\$853.61	\$878.90	\$894.20	\$907.63	\$914.50	\$921.17
\$593.00	\$593.54	\$609.69	\$618.81	\$637.14	\$648.23	\$657.93	\$662.91	\$667.75

First row adjusted using .02% average inflation rate

Second row adjusted using actual annual inflation rate.

Third row actual per box fee adjusted using actual inflation

Note: The 2007/2008 cost is based on the combination of \$593.00 per box curation fee and \$225.00 per box registration fee. The *A Decade of Study into Repository Fees for Archeological Curation 2008* article did not specify which Arizona museum provided the curation 2007/2008 fees being charged. The fee schedule was likely provided by the Arizona State Museum, but is at a minimum representative of curation fees in Arizona in 2007/2008.

Prepared by Grand Canyon State Electric Cooperative Association

Appendix C

Arizona State Museum Bulk Boxes Received/Processed

Source:

**University of Arizona
Public Records Office**

**BULK BOXES AND OBJECTS TO BE CATALOGUED RECEIVED AND PROCESSED
2006-2016**

Year	Bulk Boxes Received	Bulk Boxes Processed	Objects to be Catalogued Received	Objects to be Catalogued Processed
2006	1349	1349	1277	190
2007	641	641	1405	24
2008	1198	1198	1473	105
2009	1403	1403	2860	4
2010	806	806	866	111
2011	847	847	1732	6
2012	999	999	691	61
2013	399	399	899	31
2014	302	302	896	174
2015	858	858	889	53
2016	441	135	unknown*	0
TOTAL	9243	8937	more than 12998	759

*objects to be catalogued are identified during processing (collections intake) and the majority of 2016 boxes are unprocessed.

Backlog of boxes to process 2006-2016 =

Backlog of objects to catalog 2006-2016 =

306

12239

Appendix D

Arizona State Museum Departmental Head Count

Source:

**University of Arizona
Public Records Office**

**Arizona State Museum
Departmental Headcount**

ABOR Description	Headcount	FTE Count
Academic Professional	14	14.000
Administrative	1	1.000
Classified Staff	24	18.615
Graduate Assistant/Associate	2	0.275
Service Professional	6	6.000
Student Worker	15	4.325
Grand Total	62	44.215

Appendix E

Arizona State Museum 2016 Revenue and Expenditures

Source:

**University of Arizona
Public Records Office**

Arizona State Museum
Revenue by Sources for the Period Ended June 30, 2016

	UA	UA Foundation	Total
Sponsored Activity	\$ 589,423	\$	\$ 589,423
Endowment Interest	\$ 33,868	\$ 57,019	\$ 90,887
Gifts to UAF	\$	\$ 402,928	\$ 402,928
Gift Transfers	\$ 269,269	\$ (269,269)	\$ -
Sales & Service	\$ 531,550	\$	\$ 531,550
Mandated	\$ 430,337	\$	\$ 430,337
Non-Mandated	\$ 110,698	\$	\$ 110,698
State	\$ 2,343,007	\$	\$ 2,343,007
Store	\$ 119,572	\$	\$ 119,572
Total Revenue	\$ 4,427,724	\$ 190,677	\$ 4,618,402

NOTES:

New Permanent Endowment funds were received in the amount of \$970,000, \$500,000 to the UA and \$470,000 to the UAF.

Arizona State Museum
Expenditures by Function for the Period Ended June 30, 2016

	UA	UA Foundation	Total
Administration	\$ 804,297	\$ 25,852	\$ 830,149
Collections		\$ 22,390	\$ 22,390
Mandated	\$ 522,569		\$ 522,569
Non-Mandated	\$ 1,010,639		\$ 1,010,639
Marketing & Development	\$ 163,420	\$ 51,256	\$ 214,676
Operations	\$ 390,479	-	\$ 390,479
Preservation	\$ 261,777	\$ 15,827	\$ 277,604
Public Programs	\$ 171,978	\$ (32,126)	\$ 139,852
Research	\$ 1,046,241	\$ 45	\$ 1,046,286
Total Expenditures	\$ 4,371,401	\$ 83,243	\$ 4,454,643

ARIZONA STATE MUSEUM - MANDATED PROGRAMS
2016 Revenue/Expense Summary

Revenue

Fee Revenue \$ 430,337

Expenses

Personnel	\$	400,531	
General Expenses	\$	75,137	
UA FSO Fees	\$	46,736	
Travel	\$	167	
			<hr/>
		\$	522,569
			<hr/>
Change In Fund Balance		\$	(92,232)

NOTES:

Fee Revenue contains some revenue for expedited services from the Records Office that are not part of mandated services, but were not separately tracked, and therefore not differentiated.

Administration Detailed Expense:

Administrative Salaries	
Armendariz-Murrieta,Alma K	33,017
Dawley,Martina M	78,714
Eckert,Suzanne Lorraine	9,574
Grindell,Beth	96,203
Lyons,Patrick D	162,447
Massman,Mackenzie A	14,643
Rocha,Christina A	57,124
Speranzo,Georgine	13,509
Total Administrative Salaries	465,231
Research Cost Sharing	97,743
Internal (UA) Transfers	107,565
Security	47,821
Permanent Endowment Admin	30,000
Software Licensing	10,046
Supplies	8,480
Marketing	8,332
Entertainers & Performers	7,422
Travel	5,802
Professional Dues & Fees	4,850
Consultants	4,490
Lecturers	1,475
Professional Services	1,320
Non-Cap Equipment	1,208
Printing	1,156
Parking	683
Shipping	346
Miscellaneous	326
Total Administrative Expenses	804,297

Non-Mandatory Collections Detailed Expense:

Non-Mandatory Collections Salaries	
AZSite	86,316
NAGPRA	196,373
Other Collections Activities	289,306
Total Non-Mandatory Collections Salaries	571,994
Internal (UA) Transfers	336,526
UA FSO Fees	12,486
Acquisitions	12,556
Archives	1,667
AZSite	2,283
Travel	2,881
Publications	7,302
Ethnographic Studies	2,768
Library	1,049
Operational Supplies	17,178
Consultants & Professional Services	18,023
Temp Labor	5,524
Repairs & Maintenance	15,700
Communications	593
Professional Dues & Fees	690
Miscellaneous	1,419
Total Non-Mandatory Collections Expenses	1,010,639

**ARIZONA STATE MUSEUM
MANDATED PROGRAMS
2012-2016 REVENUE HISTORY**

	Revenue
FY2012	\$ 628,381
FY2013	\$ 527,707
FY2014	\$ 389,764
FY2015	\$ 628,862
FY2016	\$ 430,337

Note:

Revenue recorded from the Archaeological Records Office and
the Archaeological Respository

Appendix F

Arizona State Museum Historical Fees

Source:

**University of Arizona
Public Records Office**

**BURIAL AGREEMENT FEES ASSESSED BY THE STATE REPATRIATION OFFICE,
ARIZONA STATE MUSEUM, UNIVERSITY OF ARIZONA, 2003-2016
(Burial Agreement Fees)**

<u>Effective Date</u>	<u>Cost Basis</u>	<u>Burial Agreement Fee</u>
January 1, 2016	Project-specific agreement	\$300
	General agreement	\$250
January 1, 2015	Project-specific agreement	\$300
January 1, 2009	Project-specific agreement	\$300
January 1, 2003	Project-specific agreement	\$200

**BURIAL EXCAVATION AND ANALYSIS FEES ASSESSED BY THE
BIOARCHAEOLOGY OFFICE, ARIZONA STATE MUSEUM,
UNIVERSITY OF ARIZONA, 2008-2016
(Burial Excavation and Analysis Fees)**

<u>Effective Date</u>	<u>Cost Basis</u>	<u>Burial Excavation and Analysis Fee</u>
January 1, 2016	8 hours	\$440
January 1, 2015	8 hours	\$440
January 1, 2012	8 hours	\$400
January 1, 2008	8 hours	\$320

**CURATION FEES ASSESSED BY THE ARCHAEOLOGICAL REPOSITORY, ARIZONA STATE MUSEUM,
UNIVERSITY OF ARIZONA, FOR STATE-OWNED COLLECTIONS, 1981-2016
(Collections Intake Fees)**

<u>Date Effective</u>	<u>Curation Fee Category¹</u>	<u>Cost Basis</u>
January 1, 2016	Artifacts and Documentation Digital Data ²	per unit volume: \$1,000.00/box per unit volume: \$90.00/gigabyte
July 1, 2015	Artifacts and Documentation Digital Data	per unit volume: \$1,000.00/box per unit volume: \$60.00/gigabyte
January 1, 2015	Artifacts and Documentation Digital Data	per unit volume: \$785.00/box per unit volume: \$60.00/gigabyte
January 1, 2013	Artifacts and Documentation Digital Data	per unit volume: \$750.00/box per unit volume: \$30.00/gigabyte
January 1, 2012	Artifacts and Documentation Digital Data	per unit volume: \$720.00/box per unit volume: \$30.00/gigabyte
January 1, 2011	Artifacts and Documentation Digital Data	per unit volume: \$687.00/box per unit volume: \$30.00/gigabyte
January 1, 2010	Artifacts and Documentation Digital Data	per unit volume: \$654.00/box per unit volume: \$30.00/gigabyte
January 1, 2009	Artifacts and Documentation Digital Data	per unit volume: \$623.00/box per unit volume: \$30.00/gigabyte
January 1, 2008	Artifacts and Documentation Digital Data	per unit volume: \$593.00/box per unit volume: \$30.00/gigabyte

<u>Date Effective</u>	<u>Curation Fee Category¹</u>	<u>Cost Basis</u>
January 1, 2007	Artifacts and Documentation Digital Data	per unit volume: \$565.00/box per unit volume: \$30.00/gigabyte
January 1, 2005	Artifacts and Documentation	per unit volume: \$350.00/box
January 1, 2003	Monitoring Testing Systematic Surface Collection Data Recovery Additional charge for historic materials	per person-field-day (pfd): \$10.00/pfd per person-field-day (pfd): \$16.00/pfd per person-field-day (pfd): \$27.00/pfd per person-field-day (pfd): \$40.00/pfd per unit volume: \$10/box
January 1, 2002	Monitoring Testing Systematic Surface Collection Data Recovery Additional charge for historic materials	per person-field-day (pfd): \$9.25/pfd per person-field-day (pfd): \$15.00/pfd per person-field-day (pfd): \$25.00/pfd per person-field-day (pfd): \$37.00/pfd per unit volume: \$10/box
March 3, 1997	Monitoring Testing Systematic Surface Collection Data Recovery Additional charge for historic materials	per person-field-day (pfd): \$8.50/pfd per person-field-day (pfd): \$13.75/pfd per person-field-day (pfd): \$22.00/pfd per person-field-day (pfd): \$33.75/pfd per unit volume: \$10/box
July 1, 1995	Monitoring Testing Systematic Surface Collection Data Recovery Additional charge for historic materials	per person-field-day (pfd): \$7.70/pfd per person-field-day (pfd): \$12.50/pfd per person-field-day (pfd): \$20.00/pfd per person-field-day (pfd): \$30.50/pfd per unit volume: \$10/box

<u>Date Effective</u>	<u>Curation Fee Category¹</u>	<u>Cost Basis</u>
January 1, 1994	Monitoring	per person-field-day (pfd): \$6.50/pfd
	Testing	per person-field-day (pfd): \$10.50/pfd
	Systematic Surface Collection	per person-field-day (pfd): \$16.00/pfd
	Data Recovery	per person-field-day (pfd): \$24.50/pfd
	Additional charge for historic materials	per unit volume: \$10/box
January 1, 1992	Monitoring	per person-field-day (pfd): \$5.27/pfd
	Testing	per person-field-day (pfd): \$8.40/pfd
	Systematic Surface Collection	per person-field-day (pfd): \$13.80/pfd
	Data Recovery	per person-field-day (pfd): \$21.00/pfd
	Additional charge for historic materials	per unit volume: \$10/box
January 1, 1990	Monitoring	per person-field-day (pfd): \$4.40/pfd
	Testing	per person-field-day (pfd): \$7.00/pfd
	Systematic Surface Collection	per person-field-day (pfd): \$11.50/pfd
	Data Recovery	per person-field-day (pfd): \$17.50/pfd
	Additional charge for historic materials	per unit volume: \$10/box
1989	Monitoring	per person-field-day (pfd): \$4.00/pfd
	Testing	per person-field-day (pfd): \$6.50/pfd
	Systematic Surface Collection	per person-field-day (pfd): \$7.50/pfd
	Data Recovery	per person-field-day (pfd): \$11.50/pfd
1988	Monitoring	per person-field-day (pfd): \$3.25/pfd
	Testing	per person-field-day (pfd): \$6.50/pfd
	Systematic Surface Collection	per person-field-day (pfd): \$7.50/pfd
	Data Recovery	per person-field-day (pfd): \$11.50/pfd
1987	Monitoring	per person-field-day (pfd): \$7.50/pfd
	Testing	per person-field-day (pfd): \$5.00/pfd
	Systematic Surface Collection	per person-field-day (pfd): \$7.50/pfd
	Data Recovery	per person-field-day (pfd): \$12.00/pfd

<u>Date Effective</u>	<u>Curation Fee Category¹</u>	<u>Cost Basis</u>
1985	Monitoring	per person-field-day (pfd): \$7.50/pfd
	Testing	per person-field-day (pfd): \$7.50/pfd
	Data Recovery	per person-field-day (pfd): \$12.00/pfd
1983	Testing	per person-field-day (pfd): \$5.00/pfd
	Data Recovery	per person-field-day (pfd): \$12.00/pfd
1981	all materials, all activities	CRM project budget: 2% of budget

Notes:

1. Between 1981 and 1991, the Repository accepted collections from ASM's in-house CRM Division and received, in theory, 2% of each project budget for curation purposes. During this same period, private archaeological contractors were charged the fees listed in this table.
2. TIFF must be used for images and PDF/A-1 for documents.

**CONSULTATION FEES ASSESSED BY THE STATE REPATRIATION OFFICE,
ARIZONA STATE MUSEUM, UNIVERSITY OF ARIZONA, 2003-2016
(Consultation Fees: Human Remains Discovery on State Lands)**

<u>Effective Date</u>	<u>Cost Basis</u>	<u>Consultation Fee</u>
January 1, 2016	8 hours	\$300
January 1, 2003	8 hours	\$200

**CURATION FEES ASSESSED BY THE ARCHAEOLOGICAL REPOSITORY,
ARIZONA STATE MUSEUM, UNIVERSITY OF ARIZONA, FOR STATE-OWNED
COLLECTIONS, 1981-2016**

(Project Registration: Excavation/Monitoring Projects with Collections Curated at ASM)

<u>Date Effective</u>	<u>Cost Basis</u>	<u>Project Registration Fee¹</u>
January 1, 2016	Testing/excavation	\$6,000
	Monitoring	\$3,000
July 1, 2009	All activities	\$3,000
January 1, 2009	All activities	\$2,000
July 1, 2008	All activities	\$1,000
January 1, 2005	All activities	\$ 225
January 1, 2003	Monitoring	\$ 150
	Testing	\$ 150
	Systematic Surface Collection	\$ 280
	Data Recovery	\$ 280
March 3, 1997	Monitoring	\$ 140
	Testing	\$ 140
	Systematic Surface Collection	\$ 260
	Data Recovery	\$ 260
January 1, 1992	Monitoring	\$ 128
	Testing	\$ 128
	Systematic Surface Collection	\$ 235
	Data Recovery	\$ 235
January 1, 1990	Monitoring	\$ 107
	Testing	\$ 107
	Systematic Surface Collection	\$ 190
	Data Recovery	\$ 190
1989	Monitoring	\$ 97
	Testing	\$ 97
	Systematic Surface Collection	\$ 70
	Data Recovery	\$ 190

<u>Date Effective</u>	<u>Cost Basis</u>	<u>Project Registration Fee¹</u>
1988	Monitoring	\$ 90
	Testing	\$ 97
	Systematic Surface Collection	\$ 70
	Data Recovery	\$ 160
1987	Monitoring	\$ 70
	Testing	\$ 70
	Systematic Surface Collection	\$ 70
	Data Recovery	\$ 130
1985	Monitoring	\$ 70
	Testing	\$ 70
	Data Recovery	\$ 130
1983	Testing	\$ 70
	Data Recovery	\$ 130
1981	All materials, all activities	\$ 50

Notes:

1. Between 1981 and July of 2008, the Project Registration Fee was not due until the collection was submitted to the repository, even though this was often years after a curation agreement had been issued. As of July of 2008, this fee was due at the time the agreement was requested by a contractor.

**CURATION FEES ASSESSED BY THE ARCHAEOLOGICAL REPOSITORY,
ARIZONA STATE MUSEUM, UNIVERSITY OF ARIZONA,
FOR STATE-OWNED COLLECTIONS, 2015-2016
(Project Registration, Excavation/Monitoring Projects, Collections NOT Curated by ASM)**

<u>Date Effective</u>	<u>Project Registration Fee</u>
January 1, 2016	\$150
January 1, 2015	\$150

**CURATION FEES ASSESSED BY THE ARCHAEOLOGICAL RECORDS OFFICE,
ARIZONA STATE MUSEUM, UNIVERSITY OF ARIZONA,
FOR STATE-OWNED COLLECTIONS, 2003-2016
(Project Registration for Survey Projects)**

<u>Effective Date</u>	<u>Cost Basis</u>	<u>Project Registration Fee</u>
January 1, 2016	<200 acres	\$ 150
	200-499 acres	\$ 300
	500-999 acres	\$ 600
	1,000-1,999 acres	\$1200
	2000+ acres	\$1750
January 1, 2015	<200 acres	\$ 100
	200-499 acres	\$ 200
	500-999 acres	\$ 350
	1,000-1,999 acres	\$ 750
	2000+ acres	\$1000
January 1, 2014	<200 acres	\$ 100
	200-499 acres	\$ 200
	500-999 acres	\$ 350
	1,000-1,999 acres	\$ 750
	2000+ acres	\$1000
January 1, 2012	per person field day minimum \$85	\$ 20
January 1, 2007	per person field day minimum \$80	\$ 20
January 1, 2006	per person field day minimum \$75	\$ 17
January 1, 2003	per person field day minimum \$50	\$ 17

Appendix G

**Arizona State Museum
SB1418 Implementation
Powerpoint Presentation
December 12, 2016**

Source:

Arizona State Museum



SB 1418 Implementation

Arizona State Museum
Proposed Rates and Fees
12 December 2016



Arizona State Museum (ASM) Background

- **ASM is the official repository for archaeological collections** from state, county, and municipal lands in Arizona **and the permitting agency for archaeological projects** on these lands.
- **ASM also administers Arizona's human burial protection law** on state, county, municipal, and private lands.
- **The Arizona Board of Regents directs and manages ASM through the University of Arizona** and sets apart sufficient space to accommodate it, per A.R.S. §15-1631.



Recovering Costs and Uses of State Funds

- Per ARS §44-844(I) and ABOR Policy 8-205(I)(1), **rates and fees should be commensurate with the costs of services provided** in the removal, curation, or reburial of archaeological, paleontological, or historical objects or human remains as a result of construction or similar projects.
- Additionally, per ARS Titles 15 and 35 and Article 9, Section 7 of the Arizona State Constitution, **state funds must be used for allocated purposes, i.e., not to subsidize for-profit entities that contract with the University.**

General Principles for Establishing Charges

- Charges are commensurate with services provided
 - A move from task-based charges to time-based charges (direct billing of incurred costs) for all services
- Consistency in service rates across all ASM offices
- Cost recovery for curation in perpetuity via standard fees:
 - Artifacts (per box)
 - Documents (per linear foot)
- No charge for issuance of permits, consistent with ARS § 41-1001 through 41-1092

Proposed Rates for Mandated Services

- Mandated services provided, pursuant to ARS § 41-841 et seq. and ARS § 41-865:
 - Project registration
 - Burial agreements
 - Collections intake (accession, inventory, and cataloguing of collections and associated records)
 - Burial excavation and analysis
- Proposed hourly rates for mandated services:
 - Assistant = \$40
 - Specialist = \$85
 - Professional = \$127

Proposed In-Perpetuity Curation Fees

- Current-year costs:
 - Space, shelving, and environmental controls
 - Curation supplies (acid-free boxes, folders, etc.)
- Net present value of periodic costs in perpetuity:
 - Space, shelving, and environmental controls
 - Inventory of collections, per federal curation regulations and professional standards (American Alliance of Museums)
- Proposed fees for curation in perpetuity:
 - Artifacts, per box = \$3,004
 - Documents, per linear foot = \$2,577

Proposed Rate and Fee Structure

- Mandated services:
 - Project registration: hours x service rate
 - Burial agreements: hours x service rate
 - Collections intake: hours x service rate
 - Burial excavation and analysis: hours x service rate
 - Curation in perpetuity, artifacts = per-box fee
 - Curation in perpetuity, documents = per-linear-foot fee
 - Permit: no charge

Operating Procedures

- Non-binding project estimates will be provided at project initiation.
- Projects will be billed monthly based on actual service hours provided and curation fees will be due at the time of deposit based on the number of boxes of objects and linear feet of documents submitted.
 - Rates and Fees are subject to change through the process described in ARS § 15-1631, as amended by SB 1418.
 - For large and complex projects, there can be a period of 1-5 years between project initiation and the completion of some services.
 - Current Rates and Fees will be charged at the time services are provided or objects or documents are submitted.
- A deposit equal to 15% of the estimated cost of services to be rendered, not to include curation fees, will be due at project initiation.
- A software system will be used to track employee time, allowing precise and efficient determination of service-rate-based charges.
 - This system will be phased in before new, proposed fees go into effect.

**Example:
Project Registration for Monitoring
(Curated at ASM)**

- Create accession file and database record
- Create curation agreement and obtain signatures
- Prepare cover letters and mail documents
- Consult with clients as needed
- Arrange for and accept delivery
- Review submitted documentation

Old Cost Structure	New Cost Structure*
\$3,000	\$1,105

*cost estimated using time-based rates and average time to complete tasks listed

**Example:
Project Registration for Testing or Excavation
(Curated at ASM)**

- Create accession file and database record
- Create curation agreement and obtain signatures
- Prepare cover letters and mail documents
- Consult with clients as needed
- Arrange for and accept delivery, check in collections
- Review submitted documentation

Old Cost Structure	New Cost Structure*
\$6,000	\$1,315

*cost estimated using time-based rates and average time to complete tasks listed

**Example:
Project Registration for Survey
(Curated at ASM)**

- Process Notification of Intent to Conduct Survey
- Create accession file and database record
- Issue site numbers and update site number database
- Review submitted documentation
- Plot sites on maps, check landownership, update site database

Old Cost Structure	New Cost Structure*
\$0.60/acre	\$670

*cost estimated using time-based rates and average time to complete tasks listed

**Example:
Collections Intake and Curation in Perpetuity
Per box (artifacts)**

- Review electronic inventory and physically check contents of boxes against inventory
- Rehouse artifacts as needed
- Catalog and photograph objects; create database records for each catalogued object
- Inventory and rehouse documents; create database records for documents
- Inventory and upload digital images and other digital files to servers; create database records for digital files

Old Cost Structure	New Cost Structure
\$1,000	\$4,359 (\$1,355 time-based* + \$3,004 in-perpetuity)

*cost estimated using time-based rates and average time to complete tasks listed

Dear Arizona State Museum,

The Arizona Archaeological Council's (AAC) Board of Directors (Board) has reviewed the *Notice of Intent and Proposal to Increase Rates and Fees for Cultural Resource Management Services* performed by the Arizona State Museum (ASM) issued on February 10, 2017, and would like to submit this response to the proposal on behalf of its council members.

The Board recognizes the ASM's considerable burden to secure comprehensive funding for existing and future collections as well as for the overall program. Furthermore, we unequivocally support ASM staff members and would like to express our gratitude for the continued excellence of the services you provide and the manner in which they are provided. You make all our jobs easier, for which we are genuinely grateful. Finally, we appreciate the opportunity to offer constructive feedback. Accordingly, this letter outlines some potential negative impacts as well as some possible solutions. We respectfully issue this response as part of our organizational mission as advocates for archaeological preservation in Arizona and its Cultural Resource Management (CRM) community.

It is understood that ASM's current fee structure does not cover—nor has it historically covered—the costs to operate and store collections in perpetuity. The Board also acknowledges the Governor's Archaeology Advisory Commission Curation Subcommittee's effort to raise awareness and develop potential solutions to the impending curation crisis over 10 years ago (Lyons et al. 2006). We were previously unaware that ASM covers its own costs to address improperly prepared collections submitted for curation. To address these apparent shortages, ASM has developed a proposed new fee structure that includes the following changes: a shift from task-based fees to hourly service rates; inclusion of allowable operation and maintenance costs, as well as costs to cover some existing collections; charging separate per box in-perpetuity curation fees for artifacts and documents; a shift from a scaled to a flat rate, and increase in cost, of registration for survey projects; an increase in consultation fees regarding burial discoveries on State lands; an increase in burial excavation and analysis costs; and payment of 15% deposit due at project initiation. While the Board acknowledges the need for ASM to increase fees, we are concerned that some aspects of the proposed fee structure may result in unintentional negative effects.

When planning for archaeological excavation projects, certain assumptions must be developed when preparing a cost proposal. While these assumptions often are based on whatever background research is available, it is difficult to thoroughly capture the extent of costs—particularly with regard to curation—because those fees are based on unknown factors. Total curation fees often cannot be accurately assessed until the end of a project. In cases where recovered data far surpass the assumptions, there is concern that some developers may abandon projects once they are informed of the curation fees. Should that happen, presumably the holder of the repository agreement—the consultant—would be responsible for those fees. Another potential pitfall is that the new structure could discourage the leasing or purchasing of State land. Additionally, we believe that the new schedule could incentivize the underestimation of actual curation costs in proposals in order to win contracts. This could create an environment where many collections are improperly prepared for curation or simply not curated at all. Furthermore, archaeologists do not have a standard method for calculating the total volume of material including records and cultural remains that will be generated by a given investigation, and this prevents a consistent basis for estimating the cost of ASM services in developing cost proposals.

These potential effects would be detrimental to the resources, researchers, and the CRM industry. Moreover, they would be a disservice to the Native Americans who are the original inhabitants of this state. Although we understand and sympathize with the circumstances that have driven this proposal, we respectfully ask ASM to consider other alternatives.

One possible solution is to spread the curation cost more evenly across all projects, rather than calculating the fee per project based on the actual box counts and repatriated burials. In this approach the ASM service fee would be calculated as a percentage of the direct costs of all projects of any scale including surveys, monitoring, and data recovery. Small projects, those with few artifacts or no mortuary remains, would share in the curation cost of projects with large quantities of artifacts and mortuary remains. Abundant data exist for calculating a uniform percentage so that the Museum recovers the total annual costs of its services. Further, ASM could also stipulate that the fee would be paid at the start of the project, so ASM is not affected by projects that experience cost overruns. In this approach the curation fee would also be charged for each additional cost modification to the cultural resource project.

A fee based on the percentage of all direct costs has several advantages. Developers understand it is a cost of doing business on state lands, and CRM archaeologists have a uniform basis for estimating ASM fees. By basing the rate as a percentage of all direct costs (including specialized analyses, laboratory and writing costs, and consultants) data recovery projects pay a slightly greater proportion of the costs commensurate with the greater volumes of material they are likely to generate.

We encourage ASM to coordinate closely with the CRM community to develop a standardized method of assessing total curation fees and to add language under permitting requirements to discourage consultants from intentionally underestimating fees to win work.

To address the issue of collections that do not meet the guidelines outlined in the ASM Repository Manual, the Board strongly recommends that the ASM begin enforcing those guidelines and rejecting collections that do not meet the minimum requirements. Perhaps a penalty fee—based on hourly labor rates—could be added to the fee structure to further discourage consultants from submitting deficient collections.

Assuming that part of the cost burden is inherently tied to the volume of material curated at ASM, we recommend developing an agreement among the various state repositories to facilitate a more equitable distribution of future collections and to encourage consultants and agencies to select a repository based on geographical proximity to the project.

The Board appreciates the opportunity to comment on the proposed changes.

Sincerely,

AAC Board Members

Deil Lundin, President
Dave Hart, President-Elect
Thatcher Rogers, Newsletter Editor/IO
Chris Papalas, Member-at-Large

Chris Loendorf, Past President
Glenn Darrington, Secretary
Mark Brodbeck, Member-at-Large