



1717 Church Street
Nashville, TN 37203-2991
Phone: 615/320-3203
Fax: 615/327-9013
membership@aslh.org
www.aslh.org

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FROM: AASLH Professional Standards and Ethics Committee

TO: National Trust for Historic Preservation

RE: NTHP Proposed Resolution to Expand the Definition of Collection in its Collections Policy to Include Buildings and Landscapes held for the Public Good and Allow the Use of Funds from Deaccession to Fund their Care

We applaud the thorough, open and thoughtful approach the NTHP has taken in its consideration of this policy change. Given its national stature, the National Trust is well aware that many organizations look to it as a source of best practices in the area of care and interpretation of collections, historical structures, and significant landscapes. This makes it all the more important that the Trust continue to proceed with caution with regard to this change, not only in its ongoing deliberation but also once the policy becomes operational and, quite frankly, for years to come.

On the one hand the NTHP's contention that structures and landscapes often rise to the same level of importance as individual works of art or artifacts has merit. The examples that are cited – stained glass windows in situ, decorative painting, an elaborate staircase that defines a building's entryway – all support the reasonable argument that these are no less worthy of the use of direct care funds because they are still in place rather than sitting in collections storage or on exhibit.

On the other hand, no matter how carefully and reasonably crafted, any expansion of the use of funds from deaccession opens the door to misunderstanding and further expansion, particularly by organizations that are under stress or that do not have strong collections policies that are honored by staff and board members. The line between conservation and restoration of key decorative elements of a building and facilities maintenance can be both clearly defined and easily blurred.

The NTHP must continue to make it clear that:

- 1) Not ALL structures or landscapes should be designated as collections. This distinction should be reserved for structures or landscapes with sufficient significance that are also held and used for the public good.

2) There needs to be a clearly stated distinction between routine maintenance and conservation and restoration of unique and significant features of a structure or landscape to minimize the temptation to use funds for more routine though perhaps deferred or critical maintenance.

3) All use of funds from deaccession must be in keeping with existing federal, state, and local laws and recognized accounting practices.

4) Institutions must establish, maintain, and implement policies that keep the act of deaccessioning clearly distinct from the act of using the funds.

Whatever the decision of the NTHP, we urge it to continue to:

1) Reach out and present its process and progress to groups at the regional level where smaller organizations will be more likely to be exposed to the rationale behind this change and the necessary limits on its application.

2) Share with the field the initial uses of funds to help others see the process in action and to highlight the distinction between conservation or restoration and maintenance.