Ms. Mary Kendall  
Deputy Inspector General  
U.S. Department of Interior  
1849 C Street, NW  
Mail Stop 4428  
Washington, DC 20240

Dear Ms. Kendall,

I’m writing on behalf of the Society for the Preservation of Natural History Collections (SPNHC), an international organization that represents natural history collection care professionals. As a Society, we are concerned with the care of natural history collections – well-curated collections are a critical foundation for scientific research.

SPNHC was formed in 1985 and is recognized as a non-profit organization [501 (c) (3)] in the United States. Our membership includes staff in both Federal and non-Federal institutions in the U.S.A., including many that hold Federal Collections under repository agreements. The Society’s comments in respect of the new rule are limited to those aspects that relate to repositories and curatorial care.

We were recently made aware that Public Employees for Environmental Responsibility (PEER), has asked your office to review how the United States Geological Survey manages its collections, including fossil and cultural artifacts. PEER requested this review after professional scientists alerted us to problems with biological collections.

The stewardship of collections by USGS is a matter of concern to us, as this is not the first time we have been made aware of problems within the Agency. In 2012, we were approached by one of our members regarding the disposition of USGS biological collections in Albuquerque; the process of transferring the collections to another institution raised significant issues of transparency regarding their future well-being and accessibility. We contacted the Office of Science & Technology Policy regarding these concerns, but received no response from OSTP, Interior, or the USGS.

USGS has a strong scientific program, in which collections play a key part. The scientific process requires that these collections be well-curated and available in the long term for future replication/confirmation of results. The collections get more valuable with age, but only if they are looked after properly and remain accessible.

We know that the Museum Program at Interior and other interior agencies are working diligently to implement the recommendations of the 2009 report by your office on the state of the Department’s collections. The Interior Museum Program has reached out to SPNHC, and we are
currently assisting the Department and its agencies in finding ways to work more effectively with non-Federal repositories. Given the progress that is being made, it is even more concerning that PEER has highlighted such significant issues within USGS.

Given this, we strongly encourage your office to pursue PEER’s request for a review of the stewardship of collections by the USGS.

Sincerely,

Andrew Bentley  
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