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SMITHSONIAN INSTITUTION DIRECTIVES and OFFICE MEMORANDA

SD or OM #	TITLE	DATE
106	CLAIMS FILED BY AND AGAINST THE SMITHSONIAN INSTITUTION	August 29, 2011
111	METRICATION	March 5, 2008
112	INTERNAL SMITHSONIAN ANNOUNCEMENTS	June 22, 2011
113	RESPONDING TO SUBPOENAS AND REQUESTS FOR EXPERT WITNESS SERVICES	July 24, 2012
115	MANAGEMENT CONTROLS	July 23, 1996
117	HOLIDAY STAFF PARTIES	August 18, 2011
119	PRIVACY BREACH NOTIFICATION POLICY	June 24, 2010
120	SCIENTIFIC DIVING POLICY	January 18, 2012
201	SABBATICAL YEAR PROGRAM	May 30, 1972
203	TEACHING AT UNIVERSITIES	December 9, 1995
205	RESEARCH ASSOCIATES	June 7, 2001
211	EARLY DISMISSALS OF EMPLOYEES FOR HOLIDAYS	November 18, 1992
218	DRUG AND ALCOHOL TESTING AND MEDICAL EXAMINATIONS FOR COMMERCIAL DRIVERS	March 27, 2013
224	IDENTITY MANAGEMENT PROGRAM	December 7, 2011
304	GUIDELINES FOR ADMINISTERING INDIRECT COST (OVERHEAD) RATES AND CHARGES	April 24, 2006
305	ADMINISTRATIVE CONTROL OF FUNDS	May 2, 2013
312	TRAVEL	May 13, 2013
316	WAREHOUSE SUPPLIES, FORMS AND SERVICES	August 2, 2010
318	EXTERNALLY FUNDED SPONSORED PROJECTS	February 6, 2013
319	INCOMING INTERAGENCY AGREEMENTS AND TRANSFERS	May 2, 2013
320	COST-SHARING DOCUMENTATION ON SPONSORED PROJECT GRANTS AND CONTRACTS	November 29, 2011
321	REVIEW AND SUBMISSION OF PROPOSALS FOR SPONSORED PROJECTS	June 24, 2010
322	CHARGE CARD PROGRAM	August 7, 2012
323	SMITHSONIAN INSTITUTION SPENDING POLICY FOR FEDERAL APPROPRIATIONS AND TRUST FUNDS	February 14, 2012
324	SMITHSONIAN ENTERPRISES RETAIL REVENUE SHARING	April 23, 2013
401	IMPLEMENTATION HANDBOOK FOR USE OF FACILITIES FOR SPECIAL EVENTS AND PUBLIC PROGRAMS	March 2006
401	USE OF FACILITIES FOR SPECIAL EVENTS AND PUBLIC PROGRAMS	May 13, 2013
402	MAIL MANAGEMENT	January 20, 2011
405	DENYING PUBLIC ACCESS TO SMITHSONIAN PROPERTY	July 19, 2012
OM 781	PRINTING, DUPLICATING AND PHOTOGRAPHIC SERVICES	April 29, 1992
410	FACILITY CONSTRUCTION AND IMPROVEMENT PROJECTS	February 28, 2011
411	SMITHSONIAN INSTITUTION PARKING PROGRAM	September 24, 2010
414	SI ENERGY MANAGEMENT PROGRAM & WATER SUPPLY EMERGENCY PLAN	July 27, 2005
416	REAL ESTATE ASSET MANAGEMENT	September 18, 2008
420	SECURITY OPERATIONS AND POLICIES	April 21, 2011
422	SUSTAINABLE DESIGN OF SMITHSONIAN FACILITIES	February 28, 2011
500	SMITHSONIAN INSTITUTION LIBRARIES	May 3, 2011
501	ARCHIVES AND RECORDS OF THE SMITHSONIAN INSTITUTION	August 2, 1985
502	CELLULOSE NITRATE STILL PICTURE AND MOTION PICTURE FILM	April 7, 2009
503	MANAGEMENT OF ARCHIVES AND SPECIAL COLLECTIONS IN THE SMITHSONIAN INSTITUTION	October 26, 2010
OM 845	PROCUREMENT AND USE OF ARCHIVAL QUALITY ALKALINE PAPER FOR PERMANENT RECORDS	October 10, 1990
910	SMITHSONIAN GENERAL RECORDS DISPOSITION SCHEDULES	November 22, 1985
610	COLLECTIONS MANAGEMENT	October 26, 2001
OM 777	OFFICE OF ELEMENTARY AND SECONDARY EDUCATION	December 15, 1982
603	EXHIBITION PLANNING	November 6, 2003
606	RESEARCH INVOLVING HUMAN SUBJECTS	June 30, 2009
607	RESPONSIBLE CONDUCT OF RESEARCH TRAINING	October 5, 2011
608	FINANCIAL CONFLICT OF INTEREST FOR NSF-, NIH-, AND PHS-SPONSORED PROJECTS	July 3, 2012
609	DIGITAL ASSET ACCESS AND USE	July 15, 2011
610	DIGITIZATION AND DIGITAL ASSET MANAGEMENT POLICY	March 31, 2011
OM 671	PROTOCOLS AND OTHER AGREEMENTS WITH FOREIGN GOVERNMENTS AND INSTITUTIONS	August 2, 2005
OM 707	HANDLING OUTSIDE PERMISSION REQUESTS TO USE SMITHSONIAN IMAGES	April 22, 1992
OM 719	SMITHSONIAN POLICIES ON PUBLISHING BY THE INSTITUTION AND BY INDIVIDUAL STAFF MEMBERS	May 9, 1986
813	PUBLIC INFORMATION PROGRAMS	July 9, 1986
814	SOCIAL MEDIA POLICY	November 2, 2011
OM 756	POLICIES AND PROCEDURES COVERING OPPS PHOTOGRAPHIC SALES AND THE	May 6, 1992
950	MANAGEMENT OF THE SMITHSONIAN WEB	April 20, 2012



Smithsonian Institution

Office of General Counsel

VIA US MAIL

November 15, 2013

RE: Your Request for Smithsonian Records (request number 40695)

This responds to your request dated September 10, 2013, and received in this Office on September 12, 2013, for copies of certain Smithsonian Directives. The Smithsonian responds to requests for records in accordance with Smithsonian Directive 807 - Requests for Smithsonian Institution Information (SD 807) and applies a presumption of disclosure when processing such requests. The policy is posted on our website at www.si.edu/about/FOIA.

Enclosed is a CD that contains copies of the requested Smithsonian Directives, which total 918 pages. I have not included those out of date Directives we discussed by phone on November 8, 2013. Please note that Smithsonian Directive 813 is included, although it is no longer in use as it dates from 1986. All of the documents are appropriate for release without redaction and are provided in their entirety.

This concludes the Smithsonian's response to your request. Thank you for your interest in the Smithsonian.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica Sanet".

Jessica Sanet
Assistant General Counsel

Enclosure

You have the right to appeal a partial or full denial of your request. Your appeal must be in writing, addressed to the Smithsonian Institution Office of General Counsel at the address below, and made within sixty days from the date of this response letter. Your letter must explain your reason(s) for the appeal. The Smithsonian Under Secretary for Finance and Administration will decide your appeal and will respond to you in writing, specifying the reason(s) for granting or denying the appeal.



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Smithsonian
Institution

SMITHSONIAN DIRECTIVE 106,

August 29, 2011

CLAIMS FILED BY AND AGAINST THE SMITHSONIAN INSTITUTION

I.	Purpose	1
II.	Policy	1
III.	Scope	1
IV.	Responsibilities	2
V.	No Right of Action	2
VI.	Definitions	2
VII.	Claims Filed Against the Smithsonian	3
	A. Claims Filed by Employees for Damage to Personal Property	3
	B. Claims Filed by the Public for Personal Injury or Property Damage	6
VIII.	Claims Filed or Asserted by the Smithsonian Institution	8
	A. When Claims May Be Filed	8
	B. How Claims Are Asserted	8
	C. Who Has Authority to Settle Claims	9
	D. Who Is Responsible for Claims	10
	Appendix: Waivers of Overpayments	

I. Purpose

This directive provides general guidance about claims that employees and members of the public can file against the Smithsonian Institution (SI) for personal injury and property damage. It also provides general guidance about how the Smithsonian can assert civil claims against others who owe the Institution money or property.

II. Policy

The Smithsonian Institution will process claims filed by employees and members of the public, and will pursue claims against those who owe the Institution money or property, in a manner consistent with federal law and regulations.

III. Scope

This directive does not include:

- III. Scope** (continued)
- Complaints brought as a result of alleged violations of federal employment or labor laws. Refer to Smithsonian Directive (SD) 214, *Equal Employment Opportunity Handbook*, SD 212, *Federal Personnel Handbook*, and SD 213, *Trust Personnel Handbook*, for more information.
 - Complaints brought for damages other than personal injury and property damage (e.g., for copyright infringement or breach of contract), unless the outcome results in a debt that the Smithsonian is entitled to collect (see Section VIII, “Claims Filed or Asserted by the Smithsonian Institution,” below).
 - Losses governed by SD 108, Insurance and Risk Management.
 - Employee claims for on-the-job injury or disease (Workers’ Compensation). Refer to Chapters 810 in SDs 212 and 213, the *Federal* and *Trust Personnel Handbooks*, for more information.
 - Suspected violations of criminal law.
-

IV. Responsibilities Unit responsibilities depend upon the type of claim. Refer to specific sections below for more information.

V. No Right of Action This directive is intended as general guidance; it does not create or confer any legal right of action.

VI. Definitions

Assert a Claim. Make a demand for money or property that is permitted by law.

Settle a Claim. Includes (but is not limited to) determining a claim’s validity and paying or denying it in full or in part.

Employees. Those who work for and are compensated by the Smithsonian Institution, regardless of federal or trust status during work hours. Contractors are not employees.

VI. Definitions
(continued)

Volunteers, Research Associates, and Interns. For the purpose of this directive, those who perform services on behalf of the Smithsonian Institution that are comparable to work performed by SI employees ordinarily are included within the term employees.

Members of the Public. Anyone other than an employee during work hours or a person considered an employee, as defined by and for the purpose of this directive. For example, an employee is a member of the public during his or her off-duty hours.

Contractors. Those who provide goods and services to the Smithsonian through purchase orders and contracts are considered members of the public for the purpose of this directive.

Fellows. Whether a Fellow is considered an employee or a member of the public depends on whether the work she or he was performing at the time of the loss was work performed for the Smithsonian or on an independent project. Refer to specific sections below for more information.

**VII. Claims Filed
Against the
Smithsonian**

**A. Claims Filed by Employees for Damage to
Personal Property**

1. Who Can File a Claim

An employee whose personal property becomes damaged or ruined while being used in the course of his or her employment may file a claim with the Office of General Counsel (OGC), asking the Smithsonian to reimburse him or her for the loss. A contractor is not eligible to file a claim. A Fellow is not eligible to file a claim unless the work that gave rise to the loss was being performed at the request of the Smithsonian.

2. How to File a Claim

Instructions and forms for filing a claim are located on the OGC website, through either <http://prism.si.edu/ogc/> or <http://www.si.edu/ogc/>.

**VII. Claims Filed
Against the
Smithsonian**
(continued)

3. *How Claims Are Processed*

OGC will process and settle claims consistent with relevant law and regulation, including the following authorities:

- The Military Personnel and Civilian Employees' Claims Act (MPCECA), 31 *United States Code* (U.S.C.) §3721
- Employees' Personal Property Claims, Office of Personnel Management (OPM), 5 *Code of Federal Regulations* (CFR) §180, and other relevant parts from the *Code of Federal Regulations*
- Principles of Federal Appropriations Law, OGC General Accounting Office, Chapter 12, *Claims against the United States*.

The Smithsonian has wide discretion to approve or deny claims; nonetheless, a claim must meet the following requirements in order for OGC to consider reimbursement:

- (i) The employee's possession of the property was reasonable, useful, or proper under the circumstances and the loss or damage occurred within two years of filing the claim;
- (ii) The employee can substantiate the loss and value of the property; and
- (iii) The employee can demonstrate that the loss or damage occurred through no fault of the employee. (The employee need not demonstrate that the loss occurred through the fault of the Smithsonian Institution.)

OGC ordinarily will deny reimbursement under several circumstances, consistent with OPM regulations. Common bases for denials are:

**VII. Claims Filed
Against the
Smithsonian**
(continued)

- (i) The damage/loss was caused in whole or part by the negligence or wrongdoing of the employee, his or her agent, or family member
- (ii) The property was acquired or possessed in violation of a law, regulation, or SI policy
- (iii) The loss or damage arose while the employee was conducting personal business
- (iv) The property was in the employee's home at the time of the damage/loss and was not being used during telework
- (v) The loss was covered by insurance
- (vi) The property had extraordinary value (for example, gold, jewelry, paintings, antiques) and the employee did not take reasonable steps to protect and secure it
- (vii) The property is intangible, such as checks, bank books, promissory notes, stock certificates, bonds, bills of lading, warehouse receipts, baggage checks, insurance policies, money orders, and traveler's checks

4. *Who Has Authority to Settle Claims*

Only the General Counsel or the General Counsel's designee is authorized to settle a claim. In cases where the amount of the settlement exceeds \$2,500, OGC will discuss the matter with the unit director (or designee) prior to approving the claim; the General Counsel retains the authority to make the final decision about whether to approve or deny a claim, and the final amount of settlement.

5. *How Claims Are Paid*

Claims are paid by the Office of the Comptroller (OC) and charged to the SI unit responsible for the damage or, if no unit is responsible, then to the employee's unit. Acceptance by the employee of a settlement is final. An employee whose claim is

**VII. Claims Filed
Against the
Smithsonian**
(continued)

denied or who is not satisfied with the offer of settlement can request OGC to reconsider by explaining in writing the reasons the decision should be changed and payment should be made. No other appeals are available.

6. *Who Is Responsible for Claims*

Employees are responsible for reporting to their supervisors any damage to personal property, and for filing timely claims.

When requested by OGC, the Office of Risk Management (ORM) in the Office of the Treasurer will investigate the factual basis of the claim.

SI unit directors will ensure that employees under their direction cooperate with OGC and ORM in the investigation of claims.

OGC will evaluate and settle claims.

**B. Claims Filed by Members of the Public for
Personal Injury or Property Damage**

1. *Who Can File a Claim*

Members of the public can file claims, under the Federal Tort Claims Act (FTCA), against the Smithsonian Institution for injury and property damage. An employee who is within the course of his or her employment or service when the loss or injury occurred is not eligible to file a claim under the FTCA.

2. *How to File a Claim*

Claims must be filed with OGC, in writing, within two years of the incident giving rise to the claim. The claim must be signed and include the total amount of money demanded.

**VII. Claims Filed
Against the
Smithsonian**
(continued)

Instructions and forms for filing a claim are located on the OGC website, through either <http://prism.si.edu/ogc/> or <http://www.si.edu/OGC/claims.htm>.

3. How Claims Are Processed

The Office of Risk Management investigates the factual basis for each claim. Claims may be paid only when the injury or property damage is considered to be a negligent or wrongful act or omission of an employee under circumstances where the United States, if a private person, would be liable for damages.

OGC evaluates and settles claims consistent with relevant law and regulation, including the following authorities:

- Federal Tort Claims Act (FTCA), 28 U.S.C. §1346(b) and §2671–§2680
- Administrative Claims under the Federal Tort Claims Act, Department of Justice, 28 CFR Part 14
- Tort Claims, 36 CFR Part 530
- Principles of Federal Appropriations Law, OGC General Accounting Office, Chapter 12, *Claims against the United States*, §12(c)(l)(g)

4. Who Has Authority to Settle Claims

Only the General Counsel or the General Counsel's designee is authorized to settle a claim. OGC will notify the unit when the claim is settled.

5. How Claims Are Paid

Settlements for less than \$2,500 are paid by the OC and charged to the unit whose employee(s) were involved in the incident. Settlements of \$2,500 and

**VII. Claims Filed
Against the
Smithsonian**
(continued)

greater ordinarily are paid by the United States Treasury from the Judgment Fund, consistent with 31 U.S.C. §1304.

Acceptance by the claimant of a settlement is final. A person whose claim is denied or who is not satisfied with the offer of settlement can either ask OGC to reconsider or file a lawsuit in federal court. A person who is not satisfied with the outcome of a reconsideration can file a lawsuit in federal court. Time limits for filing suit are established by federal law.

6. *Who Is Responsible for Claims*

At the request of OGC, the ORM will investigate the factual basis of a claim, gather relevant documents and provide OGC with a report.

SI unit directors will ensure that employees under their direction cooperate with OGC and ORM in the investigation of claims.

OGC will evaluate and settle claims, and will coordinate with the United States Attorney in the event a claimant files suit in federal court.

**VIII. Claims Filed
or Asserted
by the Smithsonian
Institution**

A. When Claims May Be Filed

The Smithsonian Institution asserts civil claims against those who owe the Smithsonian money or property (for example, overpayments to employees and contractors, non-payment for SI goods and services, withholding SI property, and overdue rent). If an employee becomes aware of circumstances that may give the Smithsonian Institution a right to recover money or property, the employee should notify the Office of General Counsel at LegalHelp@si.edu.

B. How Claims Are Asserted

If the Smithsonian Institution demands payment and payment is not made, the Smithsonian may ask the U.S. Department of Justice to pursue collection,

**VIII. Claims Filed
or Asserted
by the Smithsonian
Institution**
(continued)

including the option to file a lawsuit in federal court against the responsible party. If the responsible party is insured, the Smithsonian may present its claim to the party's insurer.

The Smithsonian will pursue claims consistent with relevant law and regulation, including the following authorities:

- Federal Claims Collections Act (FCCA), as amended, 31 U.S.C. §3711
- Federal Claims Collection Standards (FCCS), Department of the Treasury and Department of Justice, 31 CFR Parts 900–904 (formerly 4 CFR Parts 101–105)
- Principles of Federal Appropriations Law, OGC General Accounting Office, Chapter 13, *Debt Collection*

C. Who Has Authority to Settle Claims

The director of the Office of Contracting and Personal Property Management (OCon&PPM) is authorized to settle claims for debt arising out of contracts executed by OCon&PPM. Settlements reduced to writing are subject to review and approval by OGC for conformity to law.

The president of Smithsonian Enterprises (SE) is authorized to settle claims arising out of SE contracts executed by SE. Settlements reduced to writing are subject to review and approval by OGC for conformity to law.

The Under Secretary for Finance and Administration will grant or deny employee requests for waiver of repayment of salary and benefit overpayments.

OGC is authorized to settle claims arising out of any other matters. All settlement agreements reduced to writing, regardless of who is authorized to settle, are

**VIII. Claims Filed
or Asserted
by the Smithsonian
Institution**
(continued)

subject to review and approval by OGC for conformity to law before the agreements become final.

D. Who Is Responsible for Claims

SI units will take action to collect debts arising out of their offices' activities. Action includes sending letters demanding payment and other steps as determined by the unit director in consultation with the SI office authorized to settle the claim (see "Authority to Settle" above). When a debt arises out of a contract awarded through OCon&PPM, the appropriate contracting officer will consult with the unit director to determine what action by the contracting office is necessary to collect the debt.

For all employees other than SE employees, the Office of Human Resources (OHR) and OC will determine and assess salary and benefit overpayments, and give direction to the pay agents for the Smithsonian Institution, in collecting or taking other action with regard to employee salary and benefit debts.

For so long as SE uses a pay agent separate from the rest of the Smithsonian Institution, SE will determine and assess salary and benefit overpayments for SE employees, and give direction to the pay agents for SE, in collecting or taking other action with regard to employee salary and benefit debts.

OGC will consult with SI units and assist in the collection of claims as appropriate. Under certain circumstances, OGC will refer claims to the local United States Attorney who may make additional demands or file a lawsuit in federal court. OGC will assist the United States Attorney.

The Office of Risk Management will assist SI units as appropriate. Note that the pursuit of claims in this section does not include losses governed by SD 108, Insurance and Risk Management.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 106, August 18, 1969
Office of the General Counsel (OGC)
Indefinite. Subject to review for currency 24 months from date of issue

August 29, 2011

WAIVERS OF OVERPAYMENTS MADE TO EMPLOYEES AND FELLOWS

The Smithsonian Institution will collect erroneous overpayments of pay or allowances to employees or Fellows, or overpayments of reimbursement for their travel, transportation, or relocation expenses or allowances. Reimbursements to the Smithsonian for overpayments may be made by check from the person who was overpaid or by debit from future pay or other payment due to that individual. At its sole discretion, the Smithsonian may waive repayment of these debts, in whole or in part, if collection would be against equity and good conscience and not in the best interest of the Institution.

Standards for Waivers

A waiver is only permitted when the overpayment occurred through administrative error and there is no indication of fraud, misrepresentation, fault, or lack of good faith on the part of the person who received the overpayment or anyone else with an interest in obtaining the waiver. Employees and Fellows are responsible for reviewing their earnings and leave statements, and other payment statements, and for raising any irregularities promptly with the Office of Human Resources (OHR) or the Office of the Comptroller (OC), whichever is appropriate, given the nature of the overpayment. In most circumstances, a person is not eligible for a waiver if that person failed to enquire about an unexplained increase in pay or other overpayment that a reasonable person would have questioned. Financial hardship alone is not a basis for granting a waiver.

Tax Considerations

Depending on the nature of the overpayment involved, granting a waiver may result in tax liability to the requestor.

Process for Waiver Requests

The Director of OHR decides waiver requests for overpayments of \$500 or less. The Under Secretary for Finance and Administration decides waiver requests for

overpayments of more than \$500. The Director of OHR may also, at his or her discretion, refer a waiver request to the Under Secretary for Finance and Administration, regardless of the amount involved. An individual seeking a waiver must submit a written request to the deciding official as soon as an overpayment is discovered, but not more than three years after discovery of the overpayment. The request should:

- state the requestor's name, personal mailing address, and Smithsonian affiliation, including unit, and the amount of the overpayment;
 - describe the reason(s) the overpayment was made, if this information is known or suspected. (If the requestor first discovered the overpayment, explain what action, if any, the requestor took when the overpayment was discovered.);
 - attach copies of earnings statements, or travel, transportation, or relocation documents, if available, or other documentation that provides evidence of the amount and cause of the overpayment;
 - describe the reason(s) the requestor believes that repayment of the overpayment would be against equity and good conscience, and against the best interests of the Smithsonian; and
 - provide any other related correspondence or documents the requestor would like considered.
-



DISASTER MANAGEMENT PROGRAM

Purpose	1
References	1
Program Scope	2
Program Responsibility	2
Master Plan	3
Unit Plans	3

Purpose

This directive describes the Smithsonian's Institution-wide Disaster Management Program and requirements for an Institutional Master Plan and unit-level emergency/disaster management plans.

References

As a trust establishment of the United States, the Smithsonian is committed to the general policies, principles, and procedures outlined in the following:

- Executive Order 12656, *Assignment of Emergency Preparedness Responsibilities* dated February 28, 2003, as amended.
- Executive Order 12148, *Federal Emergency Management*, dated July 20, 1979, as amended.
- Presidential Decision Directive 67, *Enduring Constitutional Government and Continuity of Government Operations*, dated October 21, 1998.
- Federal Preparedness Circular 65, *Federal Executive Branch Continuity of Operations*, dated June 15, 2004.
- National Fire Protection Association 1600, *Standard on Disaster/Emergency Management and Business Continuity Programs*, 2004 Edition, effective on February 5, 2004.

Program Scope

Most emergency situations affecting Smithsonian facilities and organizations are routinely handled within the unit or, as appropriate, by the Office of Facilities Engineering and Operations (OFEO) and local community emergency services. The Smithsonian Disaster Management Program manages those disasters beyond the scope of normal experience or expectation. The objective of the program is to ensure that the Institution can maintain essential operations in the face of a wide range of disasters.

The Smithsonian Disaster Management Program combines disaster planning and continuity of operations planning at all levels of the Institution. The program addresses three phases of emergency/disaster incidents:

- Disaster Preparedness (Hazard Identification/ Mitigation/ Risk Assessment; Plan; Exercises, Evaluations and Corrective actions; Training)
- Disaster Response (Resource Management; Direction, Control and Coordination; Communications and Warning; Operations and Procedures; Crisis Communications; Public Communications and Information; Training)
- Disaster Recovery (Short Term; Intermediate; Long Term)

The emphasis of the program is the protection of personnel (staff and visitors); and the recovery of facilities, operations, collections and research assets, as well as financial and administrative operations in an organized, efficient, and timely manner.

Program Responsibility

The Office of Protection Services (OPS) coordinates the Smithsonian Disaster Management Program by providing guidance and direction to units, monitoring progress, and reporting on the status of program's development and maintenance.

Master Plan

The program is outlined in the Smithsonian Disaster Management Program Master Plan (hereafter referred to as the Plan). The Plan details the Institution's overall requirements for preparedness and provides for the coordination and direction of the Institution's response to and recovery from a major emergency or disaster.

OPS is responsible for developing, maintaining, testing and evaluating the Plan. The OPS Disaster Management Coordinator reviews the plan annually and makes appropriate revisions in consultation with the Director, OPS. The Director, OFEO, approves the Plan and all subsequent revisions.

Unit Plans

Unit directors are responsible for developing, maintaining and exercising unit-level emergency/disaster and continuity of operations plans as an extension of the Plan. Unit directors are to appoint a senior level staff member to function as the primary person responsible for emergency/disaster planning for the unit. The unit representative is to work closely with the OPS Disaster Management Coordinator to develop, maintain, and test the unit plan in accordance with guidelines provided by OPS. The representative should seek internal unit expertise from administration, collections, research, archives and libraries, budget/ finance, facilities, safety, security and other relevant personnel and include such input in the overall planning effort.

Unit plans incorporate basic disaster planning along with comprehensive continuity of operations planning. Unit plans are designed to enhance the unit's capability to return to an acceptable level of normal operations quickly and efficiently following an emergency/disaster.

OPS will identify the units that must complete plans. OPS will maintain copies of all unit plans.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 109, December 30, 1991
Office of Protection Services
Indefinite. Subject to review for currency 24 months from date of issue

March 5, 2008

METRICATION

Introduction	1
Background	1
Policy	2
Objectives	2
References	2

Introduction

This directive affirms the Smithsonian Institution's commitment to integrating the metric system into the daily operations of the Institution as well as into its exhibitions and educational and other public programs.

Background

The Metric Conversion Act of 1975, Public Law (P.L.) 94-168, as amended by the Omnibus Trade Competitiveness Act of 1988 (P.L. 100-418), designates the metric system as the preferred system of weights and measures for U.S. trade and commerce. The goal of P.L. 94-168 is to enhance the United States' position in competitive world markets where the metric system is the accepted standard of measurement.

Executive Order 12770, issued on July 25, 1991, ordered the use of the metric system for all federal Government procurements, grants, and other business-related activities, to the extent economically feasible, except to the extent that such use is impractical or likely to cause significant inefficiencies or loss of markets, by September 30, 1992.

The metric system has been integral to the conduct of scientific research at the Smithsonian for decades. Drawing on this experience, and recognizing the values inherent in the metric system, the Smithsonian supports

Background
(continued)

and shall adhere to the spirit of these documents both in its internal operations and in its educational mission.

Policy

It is Smithsonian policy to express weights and measures in metric system numbers to the extent possible in documents for public viewing, grant and contract solicitations and awards, exhibition signage, and public presentations. When directors of museums, research centers, and offices deem it to be more practical, weights and measures may be cited in written materials in traditional terms first, followed immediately by the metric measure equivalent in parentheses.

Directors of Project Management and Engineering Design and Construction Divisions may determine the measurement system to be used on a project-by-project basis, with appropriate documentation of the decision.

Objectives

Specific objectives for metrication, in order of priority, are as follows:

- Use of the metric system in the daily operations of the Institution, particularly for procurements, grants, and other business-related activities
 - Education of Smithsonian staff in the use of the metric system
 - Incorporation of metric measurements into Smithsonian public programs in order to further public understanding of the metric system
-

References

Additional information on the metric system may be viewed at the following websites:

- United States Metric Association — <http://mathforum.org/library/view/10339.html>
- National Institute of Standards and Technology — http://ts.nist.gov/WeightsAndMeasures/Metric/mpo_home.cfm

References
(continued)

An automatic metric conversion calculator is available
at www.worldwidemetric.com on the Internet.

CANCELLATION:

SD 111, January 6, 2006

INQUIRIES:

Office of Contracting (OCon)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue

INTERNAL SMITHSONIAN ANNOUNCEMENTS

Introduction	1
Criteria	2
SI-wide Email Announcements	3
Announcements Posted to Prism	5
Responsibilities	6
Appendix A — Guidelines for Deciding: SI-wide Email or Prism Announcement?	

Introduction

This directive establishes policies and assigns responsibilities for preparing and distributing internal Smithsonian announcements to all Smithsonian Institution (SI) staff. Although this directive addresses announcements sent to an SI-wide audience, it may still be appropriate to send SI emails to targeted groups; those messages are not covered in this directive. The objective of internal announcements is to **ensure effective communication with appropriate audiences, and reduce the number of Smithsonian-wide email messages that may not pertain to all audiences**. There are now two major outlets for Smithsonian-wide communication: email and posting to the Smithsonian intranet, Prism:

1. SI-wide emails: Send under **limited** circumstances and therefore require formal approval through the Smithsonian's Office of Communications and External Affairs (OCEA). All SI-wide emails are automatically posted to Prism.
2. Announcements posted to the Smithsonian intranet, Prism: Posted to share Smithsonian information relevant to a wide audience within the Institution. In most instances, only unit-level approval is needed.

Criteria

Criteria for SI-wide Email Distribution

To qualify for Smithsonian-wide email distribution, an announcement must meet at least one of the following criteria:

- Originate from the Secretary; Under Secretaries; Secretary's Chief of Staff; Director of Communications and External Affairs; Director of Philanthropic Giving; Director of Equal Employment and Minority Affairs; General Counsel; President of Smithsonian Enterprises; or the Board of Regents, who have determined that the announcement is important for Institution-wide distribution
- Require Institution-wide viewing for legal or compliance reasons
- Pertain to a safety/security hazard, either physical or related to information technology (IT)
- Require timely employee notification as determined by OCEA, such as messages announcing new policies, new benefits or legal rights

Criteria for Posting to Prism

To qualify for posting to the Prism announcements section or the Staff Events Calendar, an announcement or staff event must meet both of the following criteria:

- Pertain to Smithsonian programs or functions where staff are invited or may attend
- Provide information relevant to a wide range of staff. If the subject is of more limited interest, the requester should post the announcement on a page specific to the relevant topic.

Examples of announcements that may be posted on Prism include, but are not limited to:

- IT upgrades, maintenance and outages

Criteria (continued)

- New and/or updated directives
- Upgrades to policy or procedure documents
- Road closures
- Events for staff (posted to the Staff Events Calendar)
- Training and education
- Health
- Vacancy announcements
- Opportunities for grants/Fellowships
- Special price discounts

Announcement Content

All SI-wide announcements, whether distributed via email or posted on Prism, must:

- comply with the criteria as described in the “Criteria” section above
- be written in clear language with proper grammar, spelling, and punctuation
- contain the name of the unit’s designated point of contact for Prism

**SI-wide Email
Announcements**

Submission and Approvals

OCEA approval is required before sending an SI-wide email announcement. To submit a Smithsonian-wide email, the requester creates the text of the announcement and routes it to internal reviewers within the sponsoring unit. On an accompanying form, the requester specifies information about the announcement, and date of email release. Attachments

**SI-wide Email
Announcements**
(continued)

to emails are prohibited due to file storage limitations; however, links to pages or fliers posted on Prism are permitted.

Approvals of proposed SI-wide emails occur first within the unit, at the director level or his/her designee. After obtaining unit approval, the requester routes the proposed announcement to the Office of Communications and External Affairs (OCEA).

After receiving an announcement request, OCEA 1) approves the announcement, 2) rejects it if the content does not fit the criteria outlined in this directive, with a short explanation, or 3) requests revisions. Once revisions are complete and OCEA has approved the final announcement, the requester issues the message via SI-wide email. If the requester is not part of the security group permitted to send SI-wide emails, he/she sends the email request to the unit's point of contact (see the subsections on email distribution and archiving below).

Additional approvals: Requesters must submit announcements that reference the legal rights or obligations of the employees or the Institution to the Office of General Counsel for approval before forwarding them to OCEA.

Email Distribution

Once an SI-wide email has been approved through the above process, requesters send SI-wide email announcements to the "SI-wide Announcements" mailbox. Each unit designates one or more points of contact (POCs) permitted to send emails to SI-wide audiences. The list of POCs should remain as stable as possible to avoid continual management of the security group and associated audience distribution lists.

Smithsonian-wide announcements are issued solely from the "SI-wide Announcements" mailbox to ensure that the audience knows it has been issued to an SI-wide audience.

**SI-wide Email
Announcements**
(continued)

Archives

SI-wide emails, once distributed, will be automatically archived to Prism's announcements archive list.

**Announcements
Posted to Prism**

Submission and Approvals

Announcements posted to Prism, unlike SI-wide emails, do not require OCEA approval. Instead, they must be approved within each unit, following unit approval procedures that incorporate the following requirements.

Requesters post announcements from within Prism. After creating the announcement, the requester routes the request to internal unit reviewers for approval or follows internal unit policy on announcement review/approval. Internal reviewers 1) approve the announcement, 2) reject it if the content does not fit the criteria outlined in this directive, or 3) request revisions. Once approved, the announcement is posted to Prism by the unit.

Additional approvals: Requesters must submit announcements that reference the legal rights or obligations of the employees or the Institution to the Office of General Counsel for approval before posting to Prism. If you believe the announcement would be of interest to the public or news media, you must contact your unit's Office of Public Affairs staff before posting it to Prism. If your unit does not have a public affairs office, then contact the central OCEA before posting.

Security

Prism provides the capability for all users to flag posted announcements as inappropriate, for review by OCEA. In such cases, OCEA retains the right to delete the flagged announcement or work with the originating unit to edit the content.

**Announcements
Posted to Prism**
(continued)

Prism provides security mechanisms that allow only designated POCs within units to create, edit, or delete only that unit's announcements, with the exception noted above of OCEA's right to delete or edit announcements flagged as inappropriate.

Display on Prism

Announcements are viewable in multiple ways, such as by topic, date, and owner. An announcement may be displayed on multiple pages in Prism, depending upon the owner's preferences.

Overall policies regarding location and formatting of announcements on Prism shall be governed by the Prism Steering Committee, with input from the user community.

Archives

Announcements are saved in an area within Prism that allows all users to view past announcements. This section is archived according to policies set forth by Smithsonian Institution Archives.

Notifications/Alerts

Prism provides subscription services and alerts that allow users to receive new announcements posted on Prism via email on topics of their choice. As such, when an announcement is created, it must be categorized with one or more related topics.

Responsibilities

Unit Representatives

Museum, research center, and office directors and their designees must:

- adhere to the criteria listed above in preparing announcements for Smithsonian-wide distribution via email and for posting on Prism

Responsibilities
(continued)

- submit proposed text for SI-wide email announcements to OCEA
- review and approve unit announcements before posting on Prism, according to internal unit approval policies

Office of Communications and External Affairs (OCEA)

The Director of OCEA and designated OCEA staff:

- determine the criteria listed in this directive for what is considered appropriate content in email and Prism announcements
- approve, reject, or request revisions to proposed email announcements based on adherence to the criteria listed in this directive
- review Prism announcements that have been flagged by users as inappropriate and remove offending announcements

Office of the Chief Information Officer (OCIO)

The Office of the Chief Information Officer:

- ensures that the technical infrastructure for email and Prism remain available
- maintains the security groups in the information systems that support email and Prism
- maintains and upgrades technical components of the announcement archive to ensure stability and availability, and upgrades those components based on feedback from the user community

CANCELLATION:
INQUIRIES:
RETENTION:

SD 971, June 28, 2002
Office of Communications and External Affairs (OC&EA)
Indefinite. Subject to review for currency 24 months from date of issue

June 22, 2011

**GUIDELINES FOR DECIDING:
SI-WIDE EMAIL OR PRISM ANNOUNCEMENT?**

If I want to send an announcement to all Smithsonian staff, how will I know if it should be sent as an SI-wide email *in addition* to posting it as a Prism announcement?

To be considered for SI-wide email distribution, the announcement must meet one of the following four conditions. Answer each of the following questions, in this order:

- 1. Is this announcement signed by one of the following?** The Secretary, an Under Secretary, the Secretary's Chief of Staff, the Director of Communications and External Affairs, Director of Philanthropic Giving, Director of Office of Equal Employment and Minority Affairs, General Counsel, President of Smithsonian Enterprises or the Board of Regents.

Answer:

If **yes**, then it qualifies as an SI-wide email. Send your draft to the Office of Communications and External Affairs (OCEA) for review and approval.

If **no**, and the announcement applies to an Institution-wide audience, then it is a Prism Announcement and should be posted by your unit's designated point of contact for Prism.

- 2. Is this announcement related to the immediate health, safety or security of Smithsonian staff, collections, buildings or information technology?**

Answer:

If **yes**, then it qualifies as an SI-wide email. Send your draft to OCEA for review and approval.

If **no**, then it is a Prism Announcement, and should be posted by your unit's designated point of contact for Prism.

3. Does this announcement have legal implications? In other words, does it reference the legal rights or obligations of the employees or the Institution?

Answer:

If **yes**, contact the Office of General Counsel (OGC) for review and approval. Once the draft announcement has been revised and approved by OGC, send the draft and OGC's response to OCEA for review and approval.

If **no**, and it applies to an Institution-wide audience, then it is likely a Prism Announcement, and should be posted by your unit's designated point of contact for Prism.

**4. Does the subject of the email require timely employee notification?
Does the email announce new policies, new benefits or legal rights?**

Answer:

If **yes**, then it *may* qualify as an SI-wide email. Send your draft to the Office of General Counsel or OCEA for review and approval.

If **no**, and it applies to an Institution-wide audience, then it is likely a Prism Announcement, and should be posted by your unit's designated point of contact for Prism.

**RESPONDING TO SUBPOENAS
AND REQUESTS FOR EXPERT WITNESS SERVICES**

I.	Purpose	1
II.	Scope	1
III.	Roles and Responsibilities	3
IV.	Policy	4
V.	Definitions	5
VI.	Procedures	5

I. Purpose

This Smithsonian Directive (SD) provides a uniform administrative policy and procedures for handling Subpoenas issued to the Smithsonian Institution (Smithsonian) or its employees or other individuals as defined below (Covered Persons). Although the Smithsonian responds to written requests for Smithsonian information in a manner that is consistent with the principles of disclosure under the Freedom of Information Act as described more fully in SD 807, a request that is submitted in the form of a Subpoena or that seeks Expert Witness services involves a specific litigation process and imposes certain legal obligations and deadlines. Under this SD, the Smithsonian will respond to Subpoenas and requests for Expert Witness services in a uniform and impartial manner that is consistent with applicable laws, regulations, and rules of judicial and administrative entities.

II. Scope

This SD applies to Subpoenas issued to the Smithsonian or Covered Persons for information acquired by the Covered Person while performing official duties or because of the Covered Person's position or association with the Smithsonian. This SD applies to Subpoenas issued in connection with proceedings pending before federal or state courts and administrative bodies. It applies to Subpoenas for documents (*subpoena duces tecum*) or testimony

II. Scope (continued) (*subpoena ad testificandum*). This SD further applies to requests directed to a Covered Person for Expert Witness services.

This SD does not apply to:

- Requests for testimony or documents from the United States Congress¹ or United States Government Accountability Office;
- Requests for Smithsonian records submitted by members of the public²;
- Subpoenas served on Covered Persons in their private or non-Smithsonian capacities. In particular, this SD does not apply to Covered Persons who voluntarily testify on their own time or on approved leave status as private citizens concerning facts or events that do not relate to their duties at the Smithsonian or to Smithsonian activities and functions. Such Covered Persons should state for the record that their testimony in such cases represents their own views and is not the official position of the Smithsonian;
- Claims against employee wages³; or
- Demands issued by foreign courts.

Nothing in this SD is intended to impede the appropriate disclosure of information to United States federal, state, local, and foreign law enforcement, prosecutive, or regulatory agencies.

This SD is procedural in nature, not substantive; it does not create any benefit, privilege, or right, whether substantive or procedural, that a party may rely upon in any legal proceeding against the United States or the

¹ Congressional correspondence should be shared with the Office of Government Relations and handled pursuant to SD 812, Government Relations.

² Such requests should be submitted to the Office of General Counsel pursuant to SD 807, Requests for Smithsonian Institution Information.

³ Requests for claims against employee wages should be handled pursuant to SD 116, Claims Against Employee Wages, and its appendices.

II. Scope (continued) Smithsonian or its officers. In providing these procedures, the Smithsonian does not waive the sovereign immunity of the United States. If the party issuing a Subpoena fails to comply with applicable laws, regulations, policies, and procedures, however, that could be a basis for denial.

III. Roles and Responsibilities

Covered Persons are responsible for compliance with this SD, including by providing to the General Counsel immediate notification of any Subpoena or request for expert witness services received and for supplying truthful and accurate information to the best of their personal knowledge.

The General Counsel represents the Smithsonian and shall advise Covered Persons regarding their responsibilities under this SD. The General Counsel is responsible for taking appropriate actions under this SD, and has the power to authorize or deny Covered Person testimony and production of documents. The General Counsel may negotiate with the party who issued the Subpoena in order to refine or limit the demands. The General Counsel shall coordinate with, and seek the assistance of, the United States Department of Justice, including United States Attorney's Offices, as appropriate, to address requests for Expert Witness services, to prepare objections, or to file motions, including but not limited to motions to remove a matter to federal court, quash a Subpoena, or obtain a protective order. The General Counsel may delegate his or her responsibilities as appropriate.

The Inspector General is responsible for performing the functions assigned to the General Counsel under this SD with respect to Subpoenas or requests for Expert Witness services that are directed to the Smithsonian Office of the Inspector General or a Covered Person employed by the Smithsonian Office of the Inspector General.

Employees with Authority to Award Contracts or Grants and Enter Other Agreements on Behalf of the Smithsonian Institution: Smithsonian employees who have this authority are responsible for notifying

III. Roles and Responsibilities
(continued)

contractors, grantors, and recipients of externally funded sub-grant and sub-contract awards of the applicable requirements in SD 113. Such notification may be accomplished by including a reference to this SD in agreements or awards, or by other means as determined appropriate and effective.

IV. Policy

No Covered Person may testify or produce Smithsonian records or information in response to a Subpoena without prior written approval from the General Counsel pursuant to this SD.

No Covered Person may serve as an Expert Witness without written prior approval from the General Counsel unless such testimony would not violate any of the principles or standards set forth in SD 103, Smithsonian Institution Standards of Conduct, and either:

- (i) in consultation with the Department of Justice, the General Counsel as ethics officer determined that the Covered Person's service as an Expert Witness is in the interest of the United States; or
- (ii) the General Counsel as ethics officer determined that the requested testimony does not relate to the Covered Person's official duties.

5 Code of Federal Regulations (C.F.R.) §2635.805; 18 United States Code (U.S.C.) § 207; SD 103 §8(a).

If a Covered Person receives a Subpoena or request for Expert Witness services that seeks documents or information created under a memorandum of understanding or similar written agreement between the Smithsonian and a U.S. federal agency, the Covered Person shall notify the Smithsonian and the agency by sending the Subpoena or request to the contact persons or representatives designated in the agreement; such designated persons shall notify their respective Office of General Counsel and those offices shall confer regarding the appropriate response to the Subpoena or request.

IV. Policy (continued) Covered Persons who testify or provide Smithsonian records or information in violation of this SD may be subject to disciplinary action or other appropriate action(s).

V. Definitions

Covered Persons: All employees, regents, officers, members of advisory boards, Fellows, interns, research associates, adjunct scientists or researchers, volunteers, and contractors of the Smithsonian, whether current or former.

Expert Witness: An Expert Witness provides testimony and/or reports based on his or her scientific, technical, or other specialized knowledge in order to assist the trier of fact in understanding the evidence or determining a fact in issue; such witness must be qualified by the court. Fed. R. Evid. 702. Ordinarily, an Expert Witness is not subpoenaed; instead, the Expert Witness is retained under a contract and paid a fee for his or her services.

General Counsel: The General Counsel of the Smithsonian or a person to whom the General Counsel has delegated authority under this SD.

Subpoena: An order commanding the recipient to appear at a particular time and place, and to provide documents or testimony, often under penalty for non-compliance.

VI. Procedures

Instructions for Submission of Subpoenas and Requests for Expert Witness Services on the Smithsonian

Subpoenas must be served directly on the General Counsel, whose contact information is available at www.si.edu/ogc.

As a trust instrumentality of the United States, the Smithsonian is not subject to state court process, and may not be subject to Subpoena by federal or state

VI. Procedures
(continued)

administrative bodies; if the proceeding is pending in a state court or administrative body, the requestor must make a request for Smithsonian records under SD 807.

In addition to complying with applicable procedural and substantive laws, regulations, and rules, all Subpoenas and requests for Expert Witness services must be accompanied by a declaration or other sworn statement containing a:

- Complete list of parties to the proceeding and identification of any known relationship the listed parties have with the Smithsonian, or to the Smithsonian's mission or programs, or to the United States;
- Showing that the desired documents or testimony cannot reasonably be obtained from a more convenient, less burdensome, or less expensive source and are not cumulative or duplicative; and
- Showing of appropriateness, including that providing the testimony would not cause the Smithsonian any undue burden or expense, require disclosure of privileged information, trade secrets, or confidential, sensitive, or private information, impede the Smithsonian's ability to conduct official business, reduce the Smithsonian's impartiality, involve the Smithsonian in issues unrelated to its mission or programs, expend public resources for private purposes, or have a negative cumulative effect on Smithsonian resources.

If the Subpoena or request for Expert Witness services seeks testimony, the declaration or other sworn statement must also contain a:

- Summary of the testimony sought and its relevance to the pending proceeding. If the Smithsonian grants authorization for testimony, unless otherwise agreed in writing, the authorization will be limited to the scope of the demand as summarized in the declaration or other sworn statement; and

VI. Procedures
(continued)

- Showing that no record could be provided and used in lieu of Covered Person testimony.

Failure to comply with these instructions may result in delay and/or a determination not to authorize testimony or production of documents.

Smithsonian Procedures upon Receipt of Request for Expert Witness Services

A Covered Person receiving a request for Expert Witness services must notify the General Counsel immediately.

The General Counsel is responsible for taking appropriate actions under this SD and has the power to authorize or deny requests where appropriate. The General Counsel may delegate his or her responsibilities as appropriate.

The General Counsel may coordinate with, and seek the assistance of, the United States Department of Justice, including the United States Attorney's Offices, as needed regarding the authorization or denial of requests, preparing objections, and/or filing appropriate motions. The General Counsel and/or the United States Department of Justice will communicate decisions authorizing or denying the request in writing to the party making the request.

Smithsonian Procedures upon Receipt of Subpoena

A Covered Person receiving a Subpoena must notify the General Counsel immediately.

The General Counsel is responsible for taking appropriate actions under this SD and has the power to authorize or deny production or testimony where appropriate. The General Counsel may delegate his or her responsibilities as appropriate.

The General Counsel may negotiate with the demander to refine or limit the Subpoena as appropriate.

VI. Procedures
(continued)

The General Counsel shall coordinate with, and seek the assistance of, the United States Department of Justice, including the United States Attorney's Offices, to prepare objections and file appropriate motions, including motions to remove the matter to federal court, quash the Subpoena, or obtain a protective order.

In evaluating a Subpoena, the Smithsonian may consider whether the Subpoena would:

- Cause the Smithsonian undue burden;
- Seek unreasonably cumulative or duplicative information;
- Seek information obtainable from a more convenient, less burdensome, or less expensive source;
- Require the disclosure of privileged information, trade secrets, or confidential, sensitive, or private information;
- Impose a burden or expense on the Smithsonian not outweighed by the likely benefit of compliance;
- Be necessary to prevent a miscarriage of justice;
- Further a Smithsonian interest in the decision that may be rendered in the proceeding;
- Be in the best interest of the Smithsonian or the United States;
- Be appropriate under Rule 45 of the Federal Rules of Civil Procedure and/or rules of procedure governing the proceeding in which the Subpoena arose;
- Be appropriate under relevant substantive law concerning privileges, immunity, and privacy;
- Violate a statute, regulation, rule of procedure, or the rights of a third party;

VI. Procedures
(continued)

- Reveal investigatory records compiled for law-enforcement purposes, and interfere with enforcement proceedings or disclose investigative techniques and procedures the effectiveness of which would thereby be impaired;
- Impede the Smithsonian's ability to conduct official business;
- Reduce the Smithsonian's impartiality;
- Involve the Smithsonian in issues that are unrelated to its mission and programs;
- Expend public resources for private purposes;
- Have a negative cumulative effect on Smithsonian resources; and
- Fulfill the purposes of this SD.

The General Counsel or the Assistant United States Attorney or other Department of Justice attorney responsible for defending the Subpoena matter will communicate decisions authorizing or denying a Subpoena in writing to the party who caused the Subpoena to be issued.

Procedure in the Event the Smithsonian Has Not Made a Decision at the Time a Response Is Required

If authorization has not been granted or denied by the time a response is required, either the General Counsel or the Assistant United States Attorney or other Department of Justice attorney responsible for defending the Subpoena matter will provide the competent authority in the proceeding from which the Subpoena arose with a copy of this SD, inform the authority that the Subpoena is under review, and seek a stay of the Subpoena pending final determination.

VI. Procedures
(continued)

Procedure in Case of Denial

In those cases in which the Smithsonian has issued a denial of a Subpoena, either the General Counsel or the Assistant United States Attorney or other Department of Justice attorney responsible for defending the Subpoena matter will provide the competent authority in the proceeding in which the Subpoena arose with the applicable reasons therefore, including as appropriate a copy of this SD, and on behalf of the Smithsonian (i) respectfully decline to comply with the Subpoena, (ii) affirmatively take all necessary or appropriate actions, including without limitation motions practice, to have the Subpoena quashed or withdrawn, and (iii) oppose any action to enforce the Subpoena or to find the Smithsonian or any Covered Person in contempt for failure to comply with the Subpoena. *United States ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951).

Fees

The Smithsonian will charge costs, including travel expenses, for employees to testify or produce documents under the relevant substantive and procedural laws and regulations. Estimated costs must be paid in advance by check or money order payable to the Smithsonian Institution. Upon determination of the precise costs, the Smithsonian either (i) will reimburse the party that caused the Subpoena to be issued for any overpayment or (ii) will charge the party that caused the Subpoena to be issued for any underpayment, which charges must be paid within 10 business days by check payable to the Smithsonian Institution at the address specified in writing.

CANCELLATION:
INQUIRIES:
RETENTION:

Not Applicable
Office of General Counsel (OGC)
Indefinite. Subject to review for currency 24 months from date of issue



SMITHSONIAN DIRECTIVES TRANSMITTAL

Smithsonian Directive 115 (Rev.)

July 23, 1996

TO: Heads of Organization Units

SUBJECT: SD 115 (Rev.), Management Controls

Attached is a copy of revised Smithsonian Directive 115, which applies to all Smithsonian activities and supersedes SD 115 [OM 823 (R)], "Internal Controls," issued on February 18, 1992.

The Institution has been responsive to the Federal Managers' Financial Integrity Act (FMFIA) since its enactment in 1982, in order to assure effective control of and accountability for its assets. The release in June 1995 of revised Office of Management and Budget (OMB) Circular A-123, which provides guidance to managers on improving, assessing, correcting, and reporting on management controls, prompted the Institution's Office of Planning, Management and Budget to undertake a review and recommend improvements. These recommendations include appointing a new oversight council, revising policy and processes, revamping management activities within those processes, and streamlining our method of reporting to OMB.

While the oversight council I have appointed will help guide the Institution's compliance with its management controls policy, museum, research institute, and office directors are responsible for ensuring that their staffs are aware of that policy. The Council asks that managers and staff direct questions about the policy to Regina Zalewski by phone at 287-3164 or by E-MAIL at FMAEM044.

Constance Berry Newman
Under Secretary

CANCELLATION:	SD 115 [OM 823 (R)] issued February 18, 1992. Office of
INQUIRIES:	Planning, Management and Budget (OPMB). Indefinite. This
RETENTION:	directive is subject to review for currency 24
	months from the date above.
FILING:	File in numerical sequence with other directives.
COPIES:	Copies of this directive may be obtained from OPMB.
EXCESS COPIES:	Please return excess copies to OPMB.



SMITHSONIAN INSTITUTION

SMITHSONIAN DIRECTIVE 115 (Rev.)

July 23, 1996

MANAGEMENT CONTROLS

Introduction

This directive provides information on the Institution's management controls program in order to

- bring SI into closer alignment with Federal directives

provide unit heads more guidance in assessing management controls
- ensure that the Institution, through an oversight council, will conduct a thorough analysis of unit assessment documents and seek methods and resources necessary to correct vulnerabilities

Relevant Public Laws

The Accounting and Auditing Act of 1950, the Federal Managers' Financial Integrity Act (FMFIA), and OMB Circular A-123 on Management Controls form the cornerstone of the management controls program.

The Accounting and Auditing Act of 1950 requires the establishment and maintenance of adequate systems of management controls over funds, property, and other assets.

The Federal Managers' Financial Integrity Act of 1982 was enacted in response to public disclosures of fraud, waste, and abuse in government operations. This Act strengthens the Accounting and Auditing Act by requiring evaluation of management controls and submission of reports to Congress.

Revised OMB Circular A-123, "Management Controls," issued under the authority of the Federal Managers' Financial Integrity Act, serves two parallel functions:

- to prevent the loss or improper use of Federal resources
 - to spur management improvement efforts
-

Relevant Public
Laws
(Continued)

The circular consolidates multiple policies, incorporates GAO standards, encourages management to work with its Chief Financial Officer (CFO) and Office of Inspector General (OIG), and emphasizes a formal, but streamlined, process. Circular A-123 also provides guidance to managers on improving accountability for and effectiveness of programs and operations. Requirements include establishing, assessing, correcting and reporting on management controls.

SI Program

The Smithsonian established an internal controls review and improvement program in 1983. To strengthen compliance with FMFIA, revisions were made in 1994. In 1995, revisions to OMB Circular A-123 provided the basis for revising Institution policy and implementing an improved program, the purposes of which are to

- make monitoring management controls more of a day-to-day activity
 - integrate the management controls process more fully with other activities
 - eliminate time-consuming and unnecessary checklists, memoranda, and reports
-

Management
Controls Defined

OMB Circular A-123 defines management controls as the organization, policies, and procedures used by managers to reasonably ensure that

- programs achieve their intended results
 - resources are used in a manner consistent with agency mission
 - programs and resources are protected from waste, fraud, and mismanagement
 - laws and regulations are followed
 - reliable data are obtained, maintained, reported, and used for sound decision-making
-

Management
Controls Defined
(Continued)

Institution managers must take systematic and proactive measures to

- develop and implement appropriate, cost-effective management controls
- assess the adequacy of management controls in both Federal and Trust programs and operations
- identify needed improvements
- take corresponding corrective action

In summary, management controls are the continuing examination of programs and activities by managers with participation by all staff; periodic evaluation of control systems through audits and other formal management reviews; and the taking of action to strengthen controls.

Standards of
Management
Controls

The Secretary is responsible for establishing and maintaining the Smithsonian's systems of management controls. A council of senior managers and other executive staff, as appropriate, exercise this responsibility through the Under Secretary. The following standards which apply to all Smithsonian units, form the basis of the Institution's management control system.

- *Compliance with Law.* All program operations, obligations and costs must comply with applicable law. Resources should be effectively allocated for duly authorized purposes.

Reasonable Assurance and Safeguards. Management controls must provide reasonable assurance that assets are safeguarded against waste, loss, unauthorized use, and misappropriation. Management controls developed for programs should be logical, applicable, reasonably complete, and effective and efficient in accomplishing management objectives.

Standards of
Management
Controls
(Continued)

Integrity, Attitude, and Competence. Managers and employees must have personal integrity and demonstrate an understanding of the importance of developing and implementing effective management controls for their programs. Managers and employees should maintain a level of professional competence that allows them to accomplish their assigned duties. Effective communication within and between offices should be encouraged.

Delegation of Authority and Organization. Managers should ensure that appropriate authority, responsibility, and accountability are delegated to accomplish the mission of the organization and that an appropriate organizational structure is established to carry out program responsibilities. To the extent possible, controls and related decision-making authority should be in the hands of line managers and staff.

Separation of Duties and Supervision. Key duties and responsibilities in authorizing, processing, recording, and reviewing official agency transactions should be separated among individuals. Managers should exercise appropriate oversight to ensure individuals do not exceed or abuse their assigned authorities.

Access and Accountability for Resources. Access to resources and records should be limited to authorized individuals, and accountability for the custody and use of resources should be assigned and maintained.

- *Recording and Documentation.* Transactions should be promptly recorded, properly classified, and accounted for in order to prepare timely accounts and reliable financial and other reports. The documentation for transactions, management controls, and other significant events must be clear and readily available for examination.

Resolution of Audit Findings and Other Deficiencies. Managers should promptly evaluate and determine proper actions in response to known deficiencies, reported audit and other findings, and related recommendations. Managers should complete, within established time frames, all actions that correct or otherwise resolve the matters brought to management's attention.

The Management Controls Process

The Institution's process of evaluation and correction covers a five-year cycle (please see attached Activity Schedule).

In year one, all unit directors or their designees will attend a half-day orientation about FMFIA and receive instruction on how to complete the required year-one Assessment of Vulnerabilities and Risks for their units, as well as the annual certification letter.

In years two through five, two activities will occur: a refresher training session will be offered for directors or their designees and all units will submit annual certification letters to provide information for the Secretary's annual FMFIA report to OMB.

No more than four years from the date of this directive, the effectiveness of the program will be evaluated. The evaluation will drive any revisions to Institutional policy, training, and activities in accordance with the requirements of OMB.

Management Responsibility

Effective management controls are the inherent responsibility of all managers and supervisors, who assure the adequacy of resource control and accountability. Directors have the option of delegating to a subordinate manager authority for the responsibilities outlined in this directive. Designation of the unit director's charge will be made in writing to the Office of Planning, Management and Budget, with copies retained by the provost or Under Secretary. All Smithsonian Institution unit directors or their designees will

- complete a half-day FMFIA orientation/training session
- conduct the Assessment of Vulnerabilities and Risks for their unit in year one
- submit an annual certification letter to the Secretary stating the condition of management controls in subsequent years of the cycle

FMFIA Council

The FMFIA Council, made up of senior managers and chaired by the Under Secretary, provides oversight for the Institution's management controls process. The Office of Planning, Management and Budget provides staff support.

FMFIA Cm.11nc11
(Continued)

The Council addresses management accountability and related issues within the context of the Institution's day-to-day activities. The Council provides an active forum to

- @ identify and classify Institution-wide risks and vulnerabilities
- monitor and critique corrective action plans
- target alternatives and locate resources to eliminate vulnerabilities and thereby minimize risk

To accomplish its goals, the Council meets at least three times a year. Concerns for the Council include:

- ensuring the Institution's commitment to an appropriate system of management controls
- reviewing the summary of risks, vulnerabilities, and corrective action plans
- identifying serious deficiencies for inclusion in the annual FMFIA report to OMB
- providing input regarding the amount and priority of resource needs to correct deficiencies
- determining when sufficient action has been taken to declare that a vulnerability has been reduced or corrected

Objective and
Benefits of An
Assessment

OBJECTIVE: The Assessment of Vulnerabilities and Risks is an evaluation tool for managers to measure the susceptibility of a program or activity to

- loss or unauthorized use of resources
 - errors in documentation and reports
 - illegal or unethical acts
-

Objective and
Benefits of All
Assessment
(Continued)

BENEFITS: The Assessment of Vulnerabilities and Risks provides an opportunity for

Managers and supervisors to identify vulnerabilities in their programs, activities, policies, and procedures and make corrections before fraud, waste, or mismanagement of resources occurs.

Directors of museums, research institutes, and offices to comment on problem areas that cannot be solved independently and that require help from other Smithsonian organizations or additional resources.

FMFIA Council to evaluate unit responses and determine actions that the Council might recommend to solve the identified problems.

Description
of Exhibits

Exhibit. 1

The Assessment of Vulnerabilities and Risks consists of three basic components:

- a cover sheet containing specific profile information about the unit

eight standards set out by OMB Circular A-123 with considerations to be used in assessing levels of risk or vulnerability

questions about the specific nature of vulnerabilities found, their impact, and planned corrective actions.

Exhibit 2

The annual certification letter is a statement of assurance that reflects the manager's informed judgment about the overall adequacy and effectiveness of management controls in his or her unit.

Each Smithsonian unit director will submit a statement of reasonable assurance that will provide input for the Secretary's annual FMFIA report to OMB.

Description of
Exhibits
(Continued)

The letter must take one of the following forms:

- ® statement of assurance
- qualified statement of assurance, with exceptions explicitly noted
- e statement of no assurance

In deciding on the type of assurance to provide, a manager should consider information from the risk assessment, continuous monitoring, and other periodic evaluations as the basis for the annual evaluation of and report on management controls required by FMFIA.

ACTIVITY SCHEDULE--YEAR 1

YEAR1	WHAT HAPPENS?	WHO DOES IT?
STEP 1	SI policy is released.	FMFIA Council with support from OPMB
STEP 2	All SI directors/designees attend FMFIA orientation and receive instruction for completing the Assessment.	Vendor assisted by OPMB
STEP 3	Directors submit assessments, with appropriate signatures, to the Secretary.	Unit Directors
STEP 4	OPMB prepares and submits a summary report of weaknesses and corrective action plans to the Council for evaluation. Council assesses and recommends action.	FMFIA Council with support from OPMB
STEP 5	Council directs OPMB development of the annual report to OMB on the condition of Institution-wide management controls.	FMFIA Council with support from OPMB

ACTIVITY SCHEDULE--YEARS 2-5

YEARS 2-5	WHAT HAPPENS?	WHO DOES IT?
STEP 1	New SI directors/designees attend FMFIA orientation refresher and receive instruction for completing the Assessment.	Vendor assisted by OPMB
STEP2	Directors submit annual certification letters, with appropriate signatures, to the Secretary. Letters reflect updates on all corrective actions since the Assessment.	Unit Directors
STEP 3	OPMB prepares and submits a summary report of annual certification letters and corrective action plans to the Council for evaluation. Council assesses and recommends action.	FMFIA Council with support from OPMB
STEP 4	Council directs OPMB development of the annual report to OMB on the condition of Institution-wide management controls.	FMFIA Council with support from OPMB

ASSESSMENT OF ORGANIZATIONAL VULNERABILITIES AND RISKS

Instructions:

1. Complete General Profile Information about your unit.
2. Read II. Rating Approach and III. Vulnerability or Risk Assessment Standards.
3. Rate your unit against each of the eight standards.
4. Prepare your unit response by answering each of the four questions in IV. Specific Responses.
5. Sign the last page of IV. Specific Responses. Two signatures are required if the preparer of the assessment is not the director of the unit.
6. Mail the General Profile Information sheet along with your Specific Responses to Regina Zalewski, OPMB, MRC 904, 7700 L'Enfant Plaza, S.W., Washington, D.C. 20560.
7. Mail a copy of the package to your respective Provost or Under Secretary.

I. General Profile Information

UNIT _____ Location _____

DIRECTOR _____ PHONE _____

PREPARER _____ TOTAL REVENUES _____

TOTAL EXPENDITURES (in \$M in FY 1996) Federal _____ Trust _____

STATUTORY REQUIREMENTS (Circle the response resembling the number of laws your unit's activities are subject to specifically(i.e., not general authorizations)):

Greater than 20, Between 10-20, Less than 10, None

Values at Potential Risk/Inventories:

Equipment (\$M) _____

Supplies/Materials (\$M) _____

Business Merchandise (\$M): _____

Collections:

Number of objects/specimens _____

Percent inadequately housed _____

Number and dollar value damaged
or lost in last FY _____

Audited Within the Past 5 Years:

If yes, when and by whom?

____None within 10 years.

Other accreditation or inspection

or certification? _____

Smithsonian Institution

ASSESSMENT OF ORGANIZATIONAL VULNERABILITIES AND RISKS

Instructions:

1. Complete General Profile Information about your unit.
2. Read II. Rating Approach and III. Vulnerability or Risk Assessment Standards.
3. Rate your unit against each of the eight standards.
4. Prepare your unit response by answering each of the four questions in IV. Specific Responses.
5. Sign the last page of IV. Specific Responses. Two signatures are required if the preparer of the assessment is not the director of the unit.
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7. Mail a copy of the package to your respective Provost or Under Secretary.

I. General Profile Information

UNIT----- **LOCATION**-----

DIRECTOR----- **PHONE**-----

PREPARER _____ TOTAL REVENUES _____

TOTAL EXPENDITURES (in \$Min FY 1996) Federal _____ Trust _____

STATUTORY REQUIREMENTS (Circle the response resembling the number of laws your unit's activities are subject to specifically(i.e., not general authorizations)):

Greater than 20, Between 10-20, Less than 10, None

Values at Potential Risk/Inventories:

Equipment (\$M) _____

Supplies/Materials (\$M) _____

Business Merchandise (\$M): _____

Collections:

Number of objects/specimens _____

Percent inadequately housed _____

Number and dollar value damaged _____

or lost in last FY _ _ _

Audited Within the Past 5 Years:

If yes, when and by whom?

____None within 10 years.

Other accreditation or inspection

or **certification?**-----

U. Rating Approach

Listed on the following pages are the eight standards for each unit to consider in its evaluation of vulnerabilities and risks. A brief description of reasonable assurance and safeguards accompanies each standard. The manager is to indicate the current risk level associated with each relevant standard, after considering the conditions which may indicate where there are possible vulnerabilities. A number from 1 (Strongly Disagree) to 4 (Strongly Agree) is selected by the manager and that number circled. All standards rated either one (1) or two (2) constitute a risk and warrant further consideration using the questions under Item IV. of the Assessment.

1	2	3	4
Strongly Disagree	Disagree	Agree	Strongly Agree

III. Vulnerability or Risk Assessment Standards

Agency managers should incorporate basic-management controls into the strategies, plans, guidance, and procedures that govern their programs and operations. Controls should be consistent with the following standards, which are drawn in large part from the "Standards for Internal Control in the Federal Government," issued by the General Accounting Office (GAO).

Each of the following eight standards is to be applied over the scope of the entire assessable unit. A unit is a museum, research institute or office, and the total resources within the authority of its director. The accompanying considerations are not all-inclusive, but are intended to help managers Institution-wide evaluate objectively the potential for fraud, waste, and mismanagement of resources under their direction. This assessment will assist Smithsonian leadership in its search for methods and resources necessary to correct vulnerabilities.

STANDARD 1 -COMPIIANCE WITH LAW

All program operations, obligations, and costs must comply with applicable law. Resources should be efficiently and effectively allocated for duly authorized purposes.

In Rating Your Unit Against Standard 1, Do You:

1
Strongly Disagree

2
Disagree

3
Agree

4
Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

Does the unit have a policy for each of its specific operating functions where applicable, such as research, documentation of all monetary transactions, acceptance of all gifts and awards, filming and photography, handling of firearms, and disposal of Federal property?

Does the unit have a policy that emphasizes the requirements of the Native American Graves Protection and Repatriation Act, Paleontological Resources Act, Endangered Species Law, U.S. Fish and Wildlife Regulations, UNESCO Convention, CITES, or other laws, as appropriate?

Do office policies and procedures reflect current program implementation or activities?. Do they accurately reflect the current objectives of the unit?

Does the unit have a system in place for identifying new legislation or regulations applicable to its operations? Is information on new laws and regulations disseminated to all staff?

Does the unit have a formal policy in relation to regulatory requirements, such as those pertaining to the Privacy Act, copyright law, and the handling of hazardous materials or waste products? Is the formal policy flexible enough to allow routine handling of unusual events and is it followed by staff and managers?

Are there gaps in policies or procedures or do existing policies need to be updated?

(Standard 1 Continued)

Are the unit's policies and procedures a "collection" of operating rules or standards from other units, government agencies or other outside entities?

Is compliance with policies and procedures monitored on a regular or periodic basis? Do all staff have an understanding of the relevance of the policies and procedures in place?

How well do employment agreements with independent contractors protect the Institution from liability in conflicts of interest or liability in adverse events?

Is management reluctant to:

- consult auditors and consultants on accounting issues?
- make appropriate disclosures?

Has noncompliance with the Antideficiency Act or other budget-related restrictions been previously reported?

Are written job descriptions and reference manuals adequately maintained?

Is communication of personnel policies and procedures adequate?

Has anyone on staff been charged with fraud or mismanagement of resources or goods?

STANDARD 2- REASONABLE ASSURANCE AND SAFEGUARDS

Management controls must provide reasonable assurance that assets are safeguarded against waste, loss, unauthorized use, and misappropriation. Management controls developed for programs should be logical, applicable, reasonably complete, and effective and efficient in accomplishing management objectives.

In Rating Your Unit Against Standard 2, Do You:

1	2	3	4
Strongly Disagree	Disagree	Agree	Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

Are there formally documented financial and other management systems which require periodic review of activities? Do these activities comply with established policy and procedures?

Does the unit have a formal policy in relation to regulatory requirements, such as those pertaining to the Privacy Act, copyright law, and the handling of hazardous materials or waste products? Is the formal policy flexible enough to allow routine handling of unusual events and is it followed by staff and managers?

Is there a formal manual or similarly documented policy and/or procedures that highlight each major aspect of the assessable unit's responsibility?

Are:

- policies or procedures communicated and easily accessible to staff?
- policies and procedures reviewed and revised if deemed necessary?
- policies and procedures in place to ensure that collection objects on exhibition or in transit are properly cared for and environmentally safe and secure?
- unit policies consistent with Institutional policies?
- appropriate security checks made of personnel when necessary?
- the channels of communication appropriate for personnel reporting suspected improprieties?

(Standard 2 Continued)

Does the unit structure encourage segregation of duties for initiating and , recording transactions and maintaining custody over assets? Is management involved in determining when, how much, and for what purpose expenditures can be made?

Is the accounting system integrated with the budget system? Is actual performance measured against the budget and are unusual or unexplained variances from the budget investigated and resolved in a timely manner? Do systems, both manual and automated, provide an audit trail?

Are collection inventory records up-to-date and accurate? Is information relating to the collections up-to-date, accurate, and accessible? Is reliable and accurate information available to make sound management decisions?

Do permanent storage facilities meet high standards of security and optimal environmental conditions?

Does the unit make use of ADP beyond a local (in office) word-processing system? How is remote ADP access monitored and controlled? Are the data used within or by the unit sensitive in nature? Is sensitive information secure?

How would you rate security of the information stored and used on your ADP equipment? Is the unit in compliance with SO 506 (SSH 1600) SI computer security policy? Do you have anti-virus software installed on all personal computers? Are safeguards in place to reduce the risk of unauthorized access to unit files and records (hard copy and computer)?

Are safeguards in place to reduce the risk of unauthorized access to space (individual, office, collections, research)?

STANDARD3 -INTEGRITY, ATTITUDE, AND COMPETENCE

Managers and employees must have personal integrity and demonstrate an understanding of the importance of developing and implementing effective management controls for their programs. Managers and employees should maintain a level of professional competence that allows them to accomplish their assigned duties. Effective communication within and between offices should be encouraged.

In Rating Your Unit Against Standard 3, Do You:

1	2	3	4
Strongly Disagree	Disagree	Agree	Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

Are managers and staff:

- concerned about management controls and the environment in which specific controls and safeguards function?
- aware of potential risks and adequately involved in designing and improving existing management controls and safeguards?

Do managers:

- demonstrate strong support for control consciousness, communicate this to each other, and consequently emphasize its importance in the performance plan and follow-up process?
- demonstrate a concern for reliable budget information?
- demonstrate an aggressive approach to following programmatic, collections management, and accounting policies?
- have the experience and background necessary for the positions they hold?

Or do they:

- demonstrate an aggressive approach to risk-taking demonstrated by disregard for resources or insensitivity to issues?
- have a history of completing large or unusual transactions near the year's end?

Are appropriate:

- security checks made when necessary? Have there been any past instances of employee involvement in fraud or mismanagement of resources or goods?
- security checks conducted of staff being considered for sensitive positions?

(Standard 3 Continued)

Are consultants selected and retained based on consistent and objective criteria?

How well do managers and staff respond to crisis situations in program, operations, and financial areas?

A low turnover rate among managers and/or staff ensures continuity in operations and programs. Is a low turnover rate predominant in the unit?

Are personnel policies adequate for hiring and retaining capable people? Are they applied in a consistent manner?

What effect have changes in management had on organization operations?

Are managers aware of Institution-wide standards and procedures for hiring, promoting, transferring, retiring, and terminating personnel? Are they implemented?

Do formal or on-the-job training programs adequately offer employees the opportunity to improve their performance or encourage their advancement?

Are performance plans current and effectively in place? Do they contain Institutionally-mandated elements where appropriate? Are they applied?

Have all employees received an annual formal performance appraisal?

Are personnel responsible for accounting or transaction processing well-trained and competent?

STANDARD 4- DELEGATION OF AUTHORITY AND ORGANIZATION

Managers should ensure that appropriate authority, responsibility, and accountability are delegated to accomplish the mission of the organization and that an appropriate organizational structure is established to effectively carry out program responsibilities. To the extent possible, controls and related decision-making authority should be in the hands of line managers and staff.

In Rating Your Unit Against Standard 4, Do You:

1	2	3	4
Strongly Disagree	Disagree	Agree	Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

.Is the organizational structure:

- appropriate for the unit's size and complexity?
- well-documented in organizational charts and functional statements?
- an effective system for communicating policies and procedures?

Does the organizational structure:

- allow for activities to be dominated and controlled by a single person or a small group? Or, are responsibilities for key activities distributed among staff and managers?
- encourage segregation of duties for initiating transactions, recording transactions, and maintaining custody over assets?
- coincide with operational responsibilities?

Are delegation of responsibility and authority, the chain of command, and the documentary procedures for activities:

- appropriate and clearly defined?
- understood by all staff and managers?
- in place at all levels of the organization?

(Standard 4 Continued)

Are the unit's:

- mission and areas of authority clearly defined and consistent?
- policies adequate regarding the assignment of responsibility and the delegation of authority for such matters as organizational goals and objectives, operating functions, and regulatory requirements?

Is there a formal periodic review of delegations that would reflect changes in activities and personnel?

Does the separation of staff duties involving transactions and responsibilities preclude waste, fraud and mismanagement of resources?

Is the budget review, approval, and revision process defined and understood?

Is management participation in directing and reviewing the budget process adequate or limited?

How adequate are the methods used to identify the status of the unit's actual financial and programmatic performance and exceptions from planned performance? How are exceptions communicated to the appropriate levels of management?

STANDARD 5- SEPARATION OF DUTIES AND SUPERVISION

Key duties and responsibilities in authorizing processing, recording, and reviewing official agency transactions should be separated among individuals. Managers should exercise appropriate oversight to ensure individuals do not exceed or abuse their assigned authorities.

In Rating Your Unit Against Standard 5, Do You:

1
Strongly Disagree

2
Disagree

3
Agree

4
Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

Are financial arrangements and transactions legitimate and distinct?

Are policies on employee supervision appropriate and up to date?

What effect have changes in management had on organizational operations?

Is the number of supervisors adequate and are supervisors accessible?

Is input obtained from the staff level in developing policies and procedures?

Are the workload of key staff conducting financial transactions reasonable and do they fall within an individual's scope of work?

Do employee job descriptions adequately delineate specific duties, responsibilities, reporting relationships, and constraints?

Are these duties and responsibilities also clearly conveyed by management?

STANDARD 6 ACCESS AND ACCOUNTABILITY FOR RESOURCES

Access to resources and records should be limited to authorized individuals, and accountability for the custody and use of resources should be assigned and maintained.

In Rating Your Unit Against Standard 6, Do You:

1	2	3	4
Strongly Disagree	Disagree	Agree	Strongly Agree

As a Guide to Your Thinking Consider These Ideas:

Is it common for individual members of top management to be closely identified with specific major projects? Can alternates or back-ups be easily identified?

Do financial estimates consistently prove to be significantly overstated or understated?

Does the potential exist for staff or managers to obtain financial or other benefits on the basis of decisions made or actions taken in an official capacity? Are there any indicators?

Is management involved in determining when, how much, and for what purpose expenditures can be made?

Are the unit's budget authority or assets managed prudently?

Do employment agreements with independent contractors protect the Institution from liability in conflicts of interest and liability in adverse events?

Is a program in place to regularly verify inventory records?

Is reliable and accurate information available about the unit's programs to make sound business decisions?

Are safeguards in place to reduce the risk of unauthorized access to space (individual, office, collections, research)?

STANDARD 7- RECORDING AND DOCUMENTATION

Transactions should be promptly recorded, properly classified, and accounted for in order to prepare timely accounts and reliable financial and other reports. The documentation for transactions, management controls, and other significant events must be clear and readily available for examination.

In Rating Your Unit Against Standard 7, Do You:

1	2	3.	4
Strongly Disagree	Disagree	Agree	Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

Does the unit disclose overly optimistic information on performance of programs and activities?

Is reliable and accurate information available to make sound decisions?

Does the unit take aggressive steps to correct problems, rather than letting the problems persist?

Are the unit's policies adequate and clear regarding the assignment of responsibility and the type of work done?

Is the intended result or impact of programs clearly defined and documented?

Are the results of actual performance adequate or sufficient given the planning and reporting systems that are set forth in management's work plans? Is the unit accomplishing its goals?

Are programs evaluated to determine whether intended results are achieved?

Are formal procedures followed for changing organizational structure to reflect new legislation, mission changes, reassignment of responsibility? Is documentation of organizational changes made in a timely manner?

(Standard 7 Continued)

Does the unit have adequate guidance, material, or instructions available to provide direction to those preparing budget information?

Can managers be reasonably assured that software in use is properly licensed?

Is a high degree of manual activity required in capturing, processing, and summarizing data? Or are unit operations automated?

What documentation safeguards are in place for unit ADP systems? Is the operation, testing, and back-up of ADP systems complete and well-documented in accordance with SI computer security policies?

Is documentation of transaction activity timely and accurate?

Do policies identify what information or data is needed to record an activity? Do policies identify who will create and maintain which documents and when?

Are policies formally reviewed, updated periodically, and cleared through proper channels? Are all guidances circulated to appropriate offices based on current mailing lists?

STANDARD 8 RESOLUTION OF AUDIT FINDINGS AND OTHER DEFICIENCIES

Managers should promptly evaluate and determine proper actions in response to known deficiencies, reported audit and other findings, and related recommendations. Managers should complete, within established time frames, all actions that correct or otherwise resolve the matters brought to management's attention.

In Rating Your Unit Against Standard 8, Do You:

1	2	3	4
Strongly Disagree	Disagree	Agree	Strongly Agree

As a Guide to Your Thinking, Consider These Ideas:

Has the unit been audited by an independent party within the past five years?

Are there major aspects of the unit that have been the subject of an audit or inspection within the past five years?

If there have been instances of deficiencies, were required corrective actions taken in an agreed-upon time frame?

Is follow-up on periodic system reviews assured through an internal review or quality assurance process that is independent of the activities under review?

Has the unit considered or facilitated recovery of misappropriated money or reclaimed goods?

Are informational reports used to monitor major program and financial activities available regularly and used for monitoring? Are these reports generally timely and accurate?

(Standard 8 Continued)

Is there evidence of a complete audit trail in both ADP and manual systems? The audit trail demonstrates how a specific transaction was initiated, processed, and summarized. For example, the audit trail for a purchase could include a purchase order, a receiving report, and invoice register (purchases summarized by day, month, and/or account), and general ledger postings from the invoice register. Some ADP financial management systems are designed so that the audit trail exists for only a short period (such as in on-line systems), only in an electronic format, or only in summary form. Also, the information generated may be too voluminous to effectively follow the audit trail. For example, one posting to the general ledger may result from the ADP summarization of information from hundreds of locations. Without a hard copy audit trail, tracing transactions through ADP processing may be extremely difficult.

Is there an audit trail of transaction and individual accountability? Are you sure that the persons with access or privileges are really who they indicate they are?

Are managers or staff reluctant to:

- consult auditors and consultants on accounting issues
- adjust the financial statements for misstatements
- make appropriate disclosures?

IV. Specific Responses- (Attach additional pages, if necessary).

Unit _____

Director's Name _____ Phone _____

1. Of the vulnerabilities or risks identified in the eight Standards of Part III., which pose the greatest vulnerability or risk for your museum, research institute, or office? Rank the vulnerabilities or any other concerns you have for your unit.

2. Of the vulnerabilities or risks identified in Part III., what would be the likelihood of any coming to the attention of the public or external regulators? If any are likely to become issues, what would the impact, consequences, or result be (for example, in terms of public opinion, fundraising, etc.)?

3. What are the primary safeguards in this area? Are these safeguards effective? If they are ineffective, please describe the nature of the vulnerability.

4. How would you propose to strengthen safeguards in this area? Identify any resources required and provide a timetable of accomplishment for corrective action. If you had the resources, provide timetable for your action plan.

Preparer **Signature**_____ Date _____

Director Signature _____ Date _____

SAMPLE ANNUAL CERTIFICATION LETTER

OFFICE OF RESEARCH AND EXHIBITS

Smithsonian Institution

Washington, D.C.

(DATE)

(ADDRESSED TO THE SECRETARY)

A review of the financial, administrative, and program management controls of the Office of Research and Exhibits has been conducted in accordance with Institutional policy.

The results of the evaluation indicate that existing management controls comply with the requirements of the Federal Managers' Financial Integrity Act, except for the vulnerabilities noted below:

Uniform procedures to process customer complaints are not in place.

Automated inventory of collections is not complete.

The following plans have been developed to correct those vulnerabilities:

ORE staff is seeking assistance from program planning staff in developing uniform procedures for customer complaints by the end of the fiscal year.

- ORE staff and managers are securing and maintaining collections inventory manually until items in all collections have been entered and verified using the optical-scan and bar-code system installed in May, 1994. Target date for completion is September, 1996.

The Office of Research and Exhibits has one manager, Douglas E. Riley, with significant responsibility for management controls. The performance plans of the staff recognize management controls accomplishments.

Sincerely,

Douglas E. Riley
Director

HOLIDAY STAFF PARTIES

Background	1
Policies	1

Background

During the holiday season, in addition to the Institution-wide holiday party, many Smithsonian units and offices hold their own staff parties. While such events are appropriate to celebrate the season in association with co-workers, appropriate guidelines should be observed.

Policies

The following policies will be observed in the planning and execution of unit and office holiday staff parties:

- Museums, galleries and other public areas are not to be closed for holiday staff parties, thus allowing visitors to continue to come to our buildings during such busy times.
- Staff parties may be held in non-public areas during the day or in public areas after normal closing time. Set-up time starting before the building is closed to the public is acceptable provided this can be accomplished without closing public areas or causing disruption to the public.
- Holiday parties should be limited to two hours in duration, not including time for set-up or clean-up.
- Refer to *SI Use of Funds Handbook*, SD 323, Section 2.1, Alcoholic Beverages — General Guidelines, and Section 2.5, Food for Employees — which is available on Prism at <http://prism2.si.edu/DocumentsForms/Pages/SDs.aspx>, for information on how SI funds may be used for these purposes under certain conditions.

Policies (continued)

- Units that wish an exception to this policy must obtain a waiver in writing from the Secretary's chief of staff.
-

CANCELLATION:

SD 117 (formerly Office Memorandum [OM] 854), November 18, 1992

INQUIRIES:

Office of Human Resources (OHR)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue

PRIVACY BREACH NOTIFICATION POLICY

Introduction	1
Definitions	1
Breach Reporting	2
Notification	2
Roles and Responsibilities	3
Appendix, Privacy Breach Reporting and Notification Process	

Introduction

Safeguarding personally identifiable information (PII) at the Smithsonian and preventing its unauthorized acquisition, access, use, or disclosure are essential to ensure the Smithsonian retains the public trust.

To that end, the Smithsonian has established the Privacy Council, the purpose of which is to coordinate the Smithsonian's response to any breach of PII at the Smithsonian.

In the event of a breach of PII, the Smithsonian will:

1. Determine whether and how to notify affected individuals and others of the incident.
2. Implement its PCI Incident Response Plan if the breach involves credit, debit, or other payment cards. The PCI Incident Response Plan is an appendix to the *Payment Card Handbook*.

Definitions

Affected individuals are those individuals whose PII was, or is reasonably believed to have been, acquired by an unauthorized person.

A **breach** is the unauthorized acquisition, access, use, or disclosure of PII that compromises the security or privacy of such information. A breach includes the compromise of a Smithsonian information system that could allow unauthorized access to PII. A breach also

Definitions
(continued)

includes the loss or theft of any physical property (including papers) that could have the same result.

Personally Identifiable Information (PII) is any information that permits an individual's identity to be directly or indirectly inferred from that information. Dates and places of birth, drivers' license numbers, mothers' maiden names, Social Security numbers, credit card numbers, resumes, fingerprints, and medical records are just a few examples of PII.

The **Smithsonian Privacy Council** (Privacy Council or Council) is a group that will coordinate the Smithsonian's response to a breach at the Smithsonian. The members of the Smithsonian Privacy Council are the Smithsonian Privacy Officer (SPO), the Chief Financial Officer (CFO), the Chief Information Officer (CIO), the Director of the Office of Human Resources (OHR), and the General Counsel. The Director of the Office of Protection Services (OPS) will serve as an *ad hoc* member of the Council. The SPO will serve as the Chair of the Council. In the absence of a SPO, the Under Secretary for Finance and Administration will be the Council Chair.

Breach Reporting

Whenever a breach occurs or is suspected, the individual or unit discovering or suspecting the breach will immediately report it to the Office of the Chief Information Officer (OCIO) or OPS, as described in the Appendix, Privacy Breach Reporting and Notification Process. Upon receiving a report of a breach, OCIO or OPS will relay it to the Privacy Council Chair.

Notification

The Privacy Council Chair will report to the Council, including, if appropriate, the Director of OPS, as soon as practicable, any breach the Chair determines to be material. A privacy breach is material if there is a reasonable possibility that it could lead to harm to an individual or to the Institution. The Council will consult with the Privacy Council Chair following a report, after which the Privacy Council Chair will determine if, when, and how to notify affected individuals and others of the

Notification
(continued)

breach, taking into account the considerations provided in the Appendix, Privacy Breach Reporting and Notification Process.

**Roles and
Responsibilities**

Every member of the Smithsonian community, including all employees, Fellows, research associates, contractors, and volunteers, is responsible for immediately reporting to OCIO (or OPS, if appropriate) upon learning of or discovering a breach. If in doubt, individuals should err in favor of reporting. Contracting Officer's Technical Representatives (COTRs) should ensure the contractors they supervise are aware of this directive and that breaches involving their contractors are reported in a manner consistent with it.

Unit Information Technology (IT) Directors will immediately notify OCIO when they detect or become aware of a breach to their unit's applications or systems.

The Privacy Council Chair will convene the Privacy Council when he or she learns of a material breach. After consulting with the Privacy Council, the Chair is responsible for deciding when, who, and how to notify of a breach. The Chair is also responsible for maintaining appropriate records of breaches, reporting, and notifications, and, when warranted, for informing the Secretary and the Board of Regents of breaches. The Privacy Council Chair will report monthly to the Privacy Council any breaches deemed nonmaterial. The SPO will serve as the Chair. In the absence of an SPO, the Under Secretary for Finance and Administration will serve as the Privacy Council Chair.

The CIO is responsible for monitoring the Institution's computer systems and networks (except for Smithsonian Enterprises' [SE] systems and networks). When OCIO detects a breach or a breach is reported to OCIO, the CIO is responsible for notifying the Privacy Council Chair. The CIO is also responsible for the appropriate technical response to a breach, such as resolving any identified security deficiencies that allowed the breach to occur. The CIO will report a

**Roles and
Responsibilities**
(continued)

breach to the U.S. Computer Emergency Readiness Team (US-CERT) when the Privacy Council Chair determines, in the exercise of his or her discretion, such a report is appropriate.

The SE CIO is responsible for monitoring SE applications, systems, and networks, and for immediately reporting any breach to the Privacy Council Chair. The SE CIO is an *ad hoc* member of the Privacy Council if SE's computer systems are identified in a privacy breach.

The Director of the Office of Government Relations (OGR), is responsible for making any institutional report to and responding to any inquiries from the executive or legislative branch of Government related to a breach, as the Privacy Council determines is appropriate, except that the CIO shall handle any US-CERT reporting. The Privacy Council Chair will advise the Director of OGR of a potential breach promptly.

The Director of Communications and Public Affairs is responsible, after consultation with the Privacy Council Chair, for responding to media inquiries and for posting any notifications on the Smithsonian's website.

The Director of OPS, is responsible for monitoring the Institution's physical security systems and for taking action to investigate and correct any physical security defects that may have permitted or been caused by a breach. OPS is responsible for promptly relaying any breach reports it receives to the Privacy Council Chair. The Director of OPS is an *ad hoc* member of the Council and shall also coordinate with law enforcement agencies in responding to a breach, as the Privacy Council directs.

The General Counsel is responsible for providing legal advice, including counsel on any Smithsonian legal or regulatory obligations, in the event of a breach.

The Risk Manager (Office of the Treasurer — Risk Management Division) is responsible for providing the Privacy Council with information about any available

**Roles and
Responsibilities**
(continued)

insurance coverage relevant to a breach and for providing any required notice of a breach to insurance carriers. The Privacy Council Chair will advise the Risk Manager of a potential breach promptly.

The **Smithsonian Privacy Officer (SPO)** serves as the Privacy Council Chair. In addition to the SPO's duties on behalf of the Privacy Council, the SPO is responsible for keeping the Under Secretary for Finance and Administration abreast of all critical, sensitive, and controversial privacy developments.

The **Under Secretary for Finance and Administration** supervises the SPO and provides broad guidance on Smithsonian privacy policies. The Under Secretary for Finance and Administration shall serve as the Privacy Council Chair in the absence of a SPO.

CANCELLATION:
INQUIRIES:
RETENTION:

Not applicable.

Office of the Under Secretary for Finance and Administration (OUSF&A).

Indefinite. Subject to review for currency 24 months from date of issue.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 119,
Appendix

June 24, 2010

PRIVACY BREACH REPORTING AND NOTIFICATION PROCESS

A. How to Report a Breach

Any member of the Smithsonian community who becomes aware of a breach is responsible for reporting it, by:

- Calling the Office of the Chief Information Officer (OCIO) at 202-633-4000 (VoIP x34000) to report a privacy breach that does not involve physical security; or
- Calling the Office of Protection Services (OPS) at 202-633-3988 (VoIP x33988) or 202-357-3116 to report a privacy breach involving physical security or if OCIO is not otherwise available.

Because it is important for the Institution to respond promptly to a breach, do not rely on voice mail or email to make reports, except after exhausting all efforts to reach a live person. Both the OCIO and OPS numbers provided will be available 24 hours a day.

Be especially careful not to make a breach worse when reporting it by, for instance, transmitting sensitive personally identifiable information (PII) through email. The unit receiving a report, whether OCIO or OPS, will forward relevant information to the Privacy Council Chair, who will coordinate the Institution's response.

B. Institutional Notification

The Privacy Council Chair will decide, in consultation with the Privacy Council, if, when, and how to make external notifications in the wake of a breach, taking into account the following considerations.

1. Is it Necessary to Notify?

To determine whether to notify affected individuals, the Privacy Council should assess the risk of harm posed by the breach. The Privacy Council will consider that when there is little or no risk of harm, notification might create

unnecessary concern and confusion. Notification could, in some circumstances, increase the risk of harm, and the prudent course of action may be to delay notification while appropriate safeguards are put in place. The Privacy Council should consider the following factors in assessing the risks a breach poses:

- a. **Nature of the Data Elements Breached.** In assessing the levels of risk posed, the Privacy Council should consider the data breached in light of their context and the broad range of potential harms flowing from their disclosure to unauthorized individuals.
- b. **Likelihood the Information Is Accessible and Usable.** Upon learning of a breach, the Privacy Council should assess the likelihood that PII will be or has been used by unauthorized individuals. An increased risk that the information will be used by unauthorized individuals should lean in favor of notification.
- c. **Risk of Compromise.** That PII has been lost or stolen does not necessarily mean it has been or can be accessed by unauthorized individuals, depending on the physical, technological, and procedural safeguards in place. If the information is properly encrypted, for example, the risk of compromise may be low.
- d. **Likelihood the Breach May Lead to Harm.**
 - 1) **Broad Reach of Potential Harm.** The Privacy Council should consider a number of possible harms associated with the loss or compromise of PII. Such harms may include a loss of confidentiality, the potential for blackmail, the disclosure of private facts, the potential for secondary uses of the information that could result in fear or uncertainty, and unwarranted exposure.
 - 2) **Likelihood Harm Will Occur.** The likelihood a breach may result in harm will depend on the manner of the actual or suspected breach and the types of data involved in the incident. Social Security and account numbers are useful for committing identity theft, as are dates of birth and passwords. If, however, the information involved is a name and address or other PII, the loss may also pose a significant risk of harm if, for example, it appears on a list of people with a contagious disease.
 - 3) **Ability of the Smithsonian to Mitigate the Risk of Harm.** The risk of harm depends, in part, on the Smithsonian's ability to mitigate further compromise of the systems affected by a breach. In addition to containing the breach, appropriate countermeasures, such as monitoring systems for misuse of the PII and patterns of suspicious

behavior, should be taken. Such mitigation may not prevent the use of PII for identity theft, but it can limit the associated harm. Some harms may be more difficult to mitigate than others, particularly where the potential injury is more individualized and may be more difficult to determine.

2. Timing of the Notification

If the Privacy Council Chair decides, following consultation with the Privacy Council, to issue a notification, she should do so without unreasonable delay, consistent with the needs of law enforcement, any measures necessary for the Smithsonian to determine the scope of the breach, and any need to restore the integrity of compromised data.

The Privacy Council Chair should decide whether to delay notification. Delay may be necessary if notification would impede the investigation of the breach. The Privacy Council Chair should weigh potential benefits of delay against the risk of further harm to any affected individuals.

3. Source of the Notification

The Privacy Council Chair should issue a notification to affected individuals. If a breach involves a Smithsonian contractor or any other entity handling PII on behalf of the Smithsonian, the Privacy Council Chair should ensure that appropriate notifications are made and appropriate corrective actions are taken. This may include directing a contracting officer to order a contractor to take steps to correct the breach.

4. Contents of the Notification to Affected Individuals

Notification to affected individuals should be in writing and should be in concise, plain language. It should include the following elements, if such information would be beneficial and would not compromise security:

- A brief description of the incident, including the date of the breach and of its discovery;
- To the extent possible, a description of the types of PII involved in the breach (e.g., name, Social Security number, date of birth, home address, account number, disability code);
- A statement as to whether the information was protected by any means;

- Steps, if any, individuals should take to protect themselves from potential harm;
- Steps the Smithsonian is taking to investigate the breach, mitigate losses, and protect against any further breaches; and
- Names of the officials that affected individuals should contact for more information, including a telephone number, email address, and postal address.

If the Smithsonian is aware that the affected individuals do not read English, the Chair should provide notice in the appropriate languages.

5. Means of Providing Notification to Affected Individuals

The best means for providing notification will depend on the number of affected individuals, the urgency with which they should receive notice, and the contact information available. The following types of notices are among those the Privacy Council may consider.

- a. Mail. Mail should be the primary means of notification. The notice should be sent separately from other mailings so it is conspicuous to the recipient. The front of the envelope will alert the recipient to the importance of its contents and will be marked with the Smithsonian's name as the sender to reduce the likelihood that the recipient thinks it is advertising mail.
- b. Telephone. Telephone notification may be appropriate in cases where urgency may dictate immediate and personalized notification or when a limited number of individuals are affected. Telephone notification, however, should be followed with written notification.
- c. Email. Notification by postal mail is generally preferable to email, but where an individual has provided an email address and has given his or her consent to receive email from the Smithsonian, notification by email may be appropriate. Email notification may also be used in conjunction with postal mail if circumstances warrant this approach.
- d. Newspapers and Other Media Outlets. The Smithsonian may supplement individual notification with notification in newspapers and other media outlets. The Smithsonian may also establish call centers to handle inquiries from affected individuals and the public.
- e. Accommodations. The Privacy Council will give special consideration to notifying affected individuals with disabilities. Accommodations may

include establishing a Telecommunications Device for the Deaf (TDD) telephone line and posting a large-print notice on the Internet.

6. Additional Notification: Public Outreach in Response to a Breach

The Privacy Council must also consider whether to notify other third parties potentially affected by the breach. If the Privacy Council Chair decides to notify affected individuals, the Privacy Council should also consider whether to notify the media and the general public.

The Privacy Council will consider the following in deciding whether to notify third parties of a breach:

- 1) Media. A decision to notify the media will require careful planning and execution so it does not cause unnecessary alarm. The Director of Communications and Public Affairs will notify the media when the Privacy Council has approved a response plan that includes media notification. Media notification should generally occur soon after discovery of a breach; delayed notification may erode public trust. Media notification should focus on providing information, including links to resources, to aid public response to the breach.
 - 2) Web Posting. The Office of Public Affairs (OPA) will post information about the breach in a clearly identifiable location on a Smithsonian website, if appropriate, as soon as possible after the Privacy Council Chair decides to provide public notification. The posting should include a link to Frequently Asked Questions (FAQs) and other information to assist the public's understanding of the breach and notification process.
 - 3) Other Organizations. Regardless of whether the Privacy Council Chair decides to notify the public, it will consider whether to notify other organizations, particularly those that may be affected by the breach or may play a role in mitigating the potential harms stemming from the breach.
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SCIENTIFIC DIVING POLICY

Purpose	1
Definitions	1
Background	2
Policy	2
Roles and Responsibilities	3
Authorities	5
Applicability	5
Inquiries	5

Purpose

This directive establishes current policies for scientific diving conducted under the auspices of the Smithsonian Institution. It outlines the roles and responsibilities of the Under Secretary for Science (USS), the Smithsonian Scientific Diving Control Board (SDCB), the Smithsonian Scientific Diving Officer (SDO), and the individual scientific diver.

All Smithsonian Institution (SI) units and organizations are directed to comply with the regulations and procedures contained in the SI *Scientific Diving Safety Manual*, Fourth Edition, 2004, which is available online at www.si.edu/dive. Because there are potential hazards and inherent risk involved in diving activities, Smithsonian scientific diving will be conducted in a manner that promotes protection of scientific divers from accidental injury and/or illness, and that minimizes liability exposure for the Institution. Fulfillment of the purposes will be consistent with the furtherance of both research and safety.

Definitions

Scientific diving is diving performed by individuals as a necessary part of a scientific, research, or educational activity, in conjunction with a project or study under the auspices of the Smithsonian Institution.

Definitions
(continued)

For the purposes of this directive, **Smithsonian auspices** include any scientific diving activity in which the Institution is connected because of:

1. ownership of any equipment used;
 2. locations selected;
 3. project sponsorship; or
 4. relationship with the individuals concerned, regardless of whether or not they are SI employees
-

Background

The Smithsonian Institution *Scientific Diving Safety Manual* provides procedures for implementation and technical guidance, and contains detailed information about the following:

- General Policy
- Diving Regulations
- Scientific Diver Training Requirements
- Diving Equipment
- Other Diving Technology
- Medical Standards
- Definition of Terms

The SI *Scientific Diving Safety Manual* is a living document that is periodically updated by the SDCB to reflect current changes in regulatory guidance and safety standards.

Policy

This directive establishes policy to ensure that all scientific diving conducted under the auspices of the Smithsonian Institution is performed in a manner consistent with applicable regulations and prevailing accepted practices and procedures for scientific diving in the United States.

Diver certification, diving criteria and procedures, and all safety standards promulgated by the SDCB shall follow the Occupational Safety and Health Administration (OSHA) regulations and guidelines for scientific diving.

Roles and Responsibilities

As the senior-level supervisor with ultimate authority over the Smithsonian's Scientific Diving Program (SDP), the **Under Secretary for Science** is responsible for the following activities:

- providing administrative oversight of, and policy approval for, matters relating to the SDP and the SDCB;
- ensuring that effective and adequate support is provided for the SDCB to conduct its official responsibilities;
- appointing a full-time SDO, based on the recommendation of the SDCB, who reports to the USS; and
- ensuring that the performance plans of SDCB members in units within the USS's purview reflect their SDCB duties during their tenure on the SDCB

As the Smithsonian's formally constituted body in charge of diving policy, operations, and diver certifications, the **SDCB** responsibilities include:

- overseeing and administering the SDP with the USS;
- approving and monitoring diving projects through the SDO;
- reviewing and revising this directive, as well as ensuring compliance with the policies it contains;
- acting as a board of investigation to study the cause of all diving accidents and safety violations;
- taking disciplinary action for unsafe diving activities, including suspension of scientific diving programs, projects, or certifications of divers;
- acting as a board of inquiry, as necessary, to consider scientific diver-related problems and their solutions;
- establishing criteria for equipment selection, use, and maintenance; and
- meeting at least annually to review the efficacy and status of diving programs and procedures

As the SDCB- and USS-designated individual accountable for all operational, diving, and safety matters, the **SDO** is responsible for the following:

**Roles and
Responsibilities**
(continued)

- directing the SDP, including:
 - planning, management, and budget;
 - conduct of training and certification activities;
 - approval of dive plans, operations, and diving certification;
 - supervision of diving medical procedures;
 - supervision of SI Diving Officers (DOs) and scientific divers; and
 - enforcement of compliance with scientific diving policies and procedures;
- serving as a voting SDCB member and Smithsonian official representing the SDP to external constituencies;
- reporting to the USS and SDCB;
- maintaining scientific diver certification and instructor qualification to teach scientific diving and specialty courses;
- submitting an annual evaluation report on each DO to his or her supervisor; and
- submitting an annual SDCB membership roster to USS

As the personnel in charge of overseeing scientific diving activities for their individual SI research units, the **DOs** have full accountability and responsibility to the SDO in all operational, diving, and safety matters, as follows:

- ensuring that the diving activities of their units comply with the policies and procedures described in the *Scientific Diving Safety Manual*;
- maintaining the diver certification records and dive logs of all SI scientific divers (and those diving under the auspices of the Smithsonian) for their research unit;
- performing diver training courses and check-out dives on behalf of the SDO;
- performing or documenting equipment maintenance and purchases as specified by the SDP standardized equipment program;
- suspending diving operations or scientific divers they consider unsafe, and reporting such action to the SDO;

Roles and Responsibilities
(continued)

- reviewing submitted dive plans for final approval by the SDO;
- maintaining current scientific diver certifications; and
- submitting reports to the SDO, in a timely fashion, on the status of diving activities and diver certifications

Authorities

The Smithsonian is not a federal executive branch agency, but the policy of the Institution is to be guided by the principles of OSHA in managing its Scientific Diving Program. Accordingly, both this directive and the *Scientific Diving Safety Manual* draw on the regulations and guidelines established for the scientific diving exemption from OSHA commercial diving standards: 29 *Code of Federal Regulations* (CFR) 1910 — Subpart T, and the *Federal Register* (FR) 47(228): 53357–53365, Nov. 26, 1982; and FR 50(6): 1046–1050, Jan. 9, 1985.

Adherence to the SDP standards has proven both feasible and effective in protecting the health and safety of SI scientific divers since 1990.

Applicability

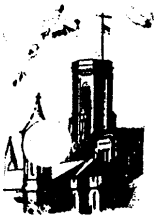
SD 120 is applicable to all scientific divers working under the auspices of the Smithsonian Institution, regardless of whether they are SI employees or not. All scientific divers are required to give their full and continuing adherence to the SDP policies and regulations described in this directive and the SI *Scientific Diving Safety Manual*.

Inquiries

Anyone with questions regarding this directive should ask a Smithsonian Scientific Diving Officer (SDO) or consult the Smithsonian *Scientific Diving Safety Manual* at <http://www.si.edu/dive> for more information.

CANCELLATION:
INQUIRIES:

SD 120, February 23, 1993
O USS-Scientific Diving Officer; or
Smithsonian *Scientific Diving Safety Manual* at www.si.edu/dive
RETENTION: Indefinite. Subject to review for currency 24 months from date of issue



SMITHSONIAN INSTITUTION

SD 201

OFFICE MEMORANDUM 628 (rev)
30 May 1972

TO: All Employees

SUBJECT: Sabbatical Year Program

In 1965 the Smithsonian Institution established a sabbatical leave program. In the ensuing seven years we have had the opportunity to evaluate the program's effectiveness and its value to the Smithsonian Institution. While the success of the program warrants its extension, there are some changes necessary to assure the program meets our needs today. Therefore, this Office Memorandum extends the program with several changes. These changes include:

1. Redefinition of the program
2. Extension of eligibility
3. Establishing procedures for application, nomination, and approval.

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Secretary

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Retention: Permanent

Cancellation: Office Memorandum 628, "Sabbatical Leave,"
dated 19 March 1965 is cancelled.

Smithsonian Institution
Sabbatical Year Program

SD 201
OM 628(rev.)
30 May 1972

PURPOSE

The purpose of the Smithsonian Sabbatical Year Program is to provide eligible Smithsonian staff with an additional opportunity to conduct a program of research, participate in advanced study, or carry on other purposeful scholarly activity at full salary, away from the job for a period of not more than twelve months. The primary use of the award will be to investigate areas of intellectual pursuit beyond normal occupational activities or which would be difficult to achieve during the course of normal employment. It is expected that this sabbatical year will contribute to the intellectual growth and to the effectiveness of the individual participant and thus be of value in his subsequent service with the Institution.

ELIGIBILITY

Any Smithsonian employee is eligible to apply for a sabbatical award, normally after six consecutive years of employment with the Institution.

STATUS

The sabbatical year participant shall continue to enjoy most benefits of Smithsonian employment: full salary, fringe benefits, statutory pay increases, within-grade increases, and consideration for promotion to positions for which he is qualified. The sabbatical year award does not carry with it support for tuition or other fees incidental to education or training, travel, per diem, or relocation expenses. This does not preclude the participant from applying to the Smithsonian Research Foundation or to other outside organizations for a grant, award, fellowship, or other support for extraordinary expenses incidental to the sabbatical year. Nevertheless, any such support must be obtained in accordance with Office Memorandum 722, "Extramural Support," or other appropriate laws or regulations.

RESPONSIBILITIES FOR PROGRAM ADMINISTRATION

A. Applicant: Application for the sabbatical year award should be made by the applicant at least nine months prior to the proposed starting date. The application must contain the following information:

1. Name of the applicant
2. Title, grade, and salary of present position
3. Date entered on duty at the Smithsonian Institution
4. Professional or work-related activities

FOLLOW-UP REPORT

Thirty days after completion of the sabbatical year, the participant will submit a report to the Secretary covering the objectives accomplished during his absence on sabbatical.

RELATIONSHIP TO SIMILAR ACTIVITIES

1. Long-term formal training or education (see O. M. 749): The basic difference is that in addition to full salary and benefits, the participant in this activity also receives support for tuition, books, and related fees, travel, per diem, relocation costs (as appropriate). To be eligible, the employee must have completed one year of current continuous service if such training or education is to be accomplished through a non-Government facility. Such training and education may not exceed one year in each ten years of Federal service. The participant signs an agreement to return to the Smithsonian Institution at the completion of the training or education and remain for a period equal to at least three times the amount of time spent in training or education.

2. Leave of absence for teaching: The basic difference is that the individual involved does not receive salary compensation from the Smithsonian during an extended absence for the purpose of teaching in a college or university. Fringe benefits (e. g. health and life insurance) continue for up to one year. No other financial support is provided;

3. It may be possible that a request for sabbatical could propose a project directly related to the applicant's official duties, to an ongoing project of his bureau or another, or may be part of either short- or long-range plans of a Smithsonian component. In such a case, the official assignment of the applicant to the project, as through detail, change of duty station, etc., may be more appropriate than the awarding of a sabbatical.



SMITHSONIAN DIRECTIVES CHANGE TRANSMITTAL


Smithsonian Directive 203

December 9, 1995

TO: Heads of Organization Units

SUBJECT: Smithsonian Directive 203, Teaching at Universities

Attached is SD 203, which outlines policy for teaching at universities and participating in related academic activities. This directive revises and updates OM 684 (Rev.) issued on June 6, 1988, and renumbered in accordance with SD 100 dated October 18, 1993.


Robert S. Hoffmann
Provost

CANCELLATION:	OM 684 (Rev.) dated June 8, 1988.
INQUIRIES:	Office of the Provost.
RETENTION:	Indefinite. This directive is subject to review for currency 24 months from the date above.
FILING:	File in numerical sequence with other directives.
COPIES:	Copies of this directive may be obtained from the Office of Planning, Management and Budget (OPMB).
EXCESS COPIES:	Please return excess copies to OPMB.



SMITHSONIAN INSTITUTION

SMITHSONIAN DIRECTIVE 203

December 9, 1995

TEACHING AT UNIVERSITIES

Background

The Institution recognizes the value of its professional staff members teaching at other educational institutions and encourages them to seek opportunities to participate in formal instruction at the university level in subjects related to their disciplines. The Smithsonian also recognizes that the nature and extent of such commitments is a matter of individual choice and case-by-case management decisions.

Policy

Teaching on Official Time

Staff members who wish to teach on official time at the Smithsonian or elsewhere must have the approval of their immediate supervisor and of their museum, research institute, or office director before such commitments are made.

The use of official time for graduate and advanced undergraduate instruction, whether at the Smithsonian or at another institution of learning, is rated on the same basis as other forms of professional activities.

When a Smithsonian staff member teaches on official time, facilities and instruction fees may be arranged with the university at the discretion of the museum, research institute, or office director. These fees are to be returned to the unit's programs!

Teaching on Personal Time

Staff members may be paid directly for teaching only if it is conducted during personal time. Preparation for such teaching, including writing lecture notes and counseling students, also must be done on personal time.

Policy
(Continued)

Approval of the appropriate supervisor, museum, research institute, or office director, and Smithsonian ethics counselor must be obtained prior to undertaking off-duty teaching that (1) involves a personal payment and is similar or related to Smithsonian responsibilities or (2) involves the use of Smithsonian facilities or other resources. Please refer to SD 103, Standards of Conduct, especially sections 7 and 12.

In cases where the use of Smithsonian facilities or other resources are involved, facilities and instruction fees may be arranged in the same manner as described for teaching on official time.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 205

June 7, 2001

RESEARCH ASSOCIATES

Purpose	1
Policy	1
Definition	2
Appointment Procedures	2
Standards of Conduct	3
Contact Point	4
<u>Appendix A</u> , Sample Appointment Letter	

Purpose

This revision of SD 205 addresses only research associates. Information regarding research staff who are employees of the Institution may be found in SD 212, *Federal Personnel Handbook*, and SD 213, *Trust Personnel Handbook*.

Policy

The title of research associate is a title offered to provide a formal scholarly affiliation with the Institution.

Research associates are not employees of the Smithsonian. The terms of appointment are governed by the appointment letter, which should set forth the terms and conditions of the relationship. In certain circumstances, however, research associates may provide a service to the Institution similar to that which would be provided by an employee, in which case certain legal protections may apply.

Research associate appointments may be made for a period of up to three years and may be renewed.

Policy
(Continued)

Research associates may apply, with approval from appropriate channels, for outside grants or contracts, using the Smithsonian as a home institution. For further information, please contact the Office of Sponsored Projects.

Research associates must adhere to the standards of conduct described below under *Standards of Conduct*. Pamphlets containing the Standards of Conduct are available from the Office of Fellowships.

Definition

A research associate should

- have attained professional status (usually a terminal degree or equivalent experience) in the field of the appointment
- not currently be a permanent Smithsonian employee
- normally not have an academic appointment, such as fellow, visiting student, or scholar at the Smithsonian
- be in residence at the Institution conducting scholarly research or otherwise engaged in the scholarly activities of the Smithsonian
- if not in residence at the Institution, be working collaboratively with a staff member or the Institution on a scholarly activity

Research associates may be more narrowly defined by an individual museum, research institute or office director.

**Appointment
Procedures**

Research staff should nominate individuals by providing the unit director with a curriculum vitae and a short justification for the appointment.

All research associate appointments are approved and awarded by the director of the host museum, research institute, or office.

**Appointment
Procedures**
(Continued)

An information pamphlet including the standards of conduct must be included with the appointment letter (Appendix A) signed by the unit director.

A copy of the appointment letter, curriculum vitae, and justification should be sent to the Office of Fellowships, which maintains a database of all research associates and reminds sponsors when appointments are nearing completion.

Standards of Conduct

It is the responsibility of research associates to conduct themselves in compliance with the general principles and specific provisions of these standards. If there is any doubt as to whether their activities or planned activities are in compliance, the research associate should immediately seek the advice of his or her host.

Failure to comply with the following standards is cause for revoking the research associate appointment.

Research associates must not

- misrepresent their relationship to the Institution, particularly in any way representing themselves as employees of the Smithsonian
- for the purpose of furthering a private interest, directly or indirectly make use of, or permit others to make use of, information obtained through their Smithsonian appointment that is or would be unavailable to external scholars or the general public
- use official Smithsonian letterhead and similar materials, mailing privileges, or equipment, or supplies for anything not related to official Smithsonian business
- obtain official Smithsonian Institution business cards that use the title of research associate. Under unusual circumstances, research associates who have a special affiliation with the Institution may request permission to obtain and use business cards from the unit director. Certain restrictions may be applied to their use.
- reproduce copyrighted material in the absence of specific approval to do so from the owner of the copyright

Standards of Conduct
(Continued)

Research associates must

- follow prevailing standards for conducting research in the discipline, such as those for collecting and import permits and using live animals or human subjects
- adhere to the rules set by the Smithsonian Institution Libraries and unit libraries

Receipt, expenditure and commitment of funds, such as grants or contracts to the Institution or grants from within the Institution, must be approved and financially administered by a Smithsonian employee, and the appropriate unit must accept fund management. This financial oversight includes ensuring the filing of final reports and adherence to all rules and regulations pertaining to the specific grant.

Individuals with access to collections should be aware of the issues addressed in the respective unit's collections management policy and Smithsonian Directive 600, *Collections Management*. Access to and use of collections must be approved in advance by the appropriate unit staff member in accordance with established policy and procedures. Research associates working directly with Smithsonian collections must disclose any personal activity that may create or seem to create conflicts of interest, such as collecting or dealing in similar objects, materials, or specimens.

Contact Point

The Office of Fellowships is located at 750 9th Street, N.W., Room 9300, MRC 902. The telephone number is 202-275-0655.

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SD 205, March 23, 1983
Office of Fellowships
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SAMPLE APPOINTMENT LETTER

Smithsonian Museum or Research Institute Letterhead

Date

Address

Dear _____:

It gives me great pleasure to inform you of your (appointment/reappointment) as a Research Associate in the Department, at the Museum or Research Institute, Smithsonian Institution, for a period of three years, effective Date.

The following may be modified or rewritten if you so choose.

I wish to take this opportunity to (once again) welcome you to the Smithsonian Research community and to express my confidence that this affiliation will be the (start/continuation), of a mutually beneficial and valuable association.

Please be aware that there are a number of policies and standards of conduct that must be followed by persons holding this title. They are addressed in the accompanying pamphlet.

The following may be modified or rewritten if you so choose.

Congratulations on this appointment.

Sincerely,

Director

Enclosure

bcc: Chairman
Sponsor
Office of Fellowships



SMITHSONIAN DIRECTIVES TRANSMITTAL

November 18, 1992

TO: Heads of organization units

SD 211

SUBJECT: OM 855, Early Dismissals of Employees for Holidays

This office memorandum describes policies and procedures for any administratively authorized early group dismissal of Smithsonian employees on the eve of a holiday.

Information on group dismissals of employees for emergencies can be found in Smithsonian Staff Handbook 1100, Federal Personnel Manual. Leave policy related to group dismissal situations may be found in Chapter 630.


Under Secretary

CANCELLATION:	Not Applicable
INQUIRIES:	Office of Human Resources
RETENTION:	Indefinite. This OM is subject to review for currency 18 months from the date hereof.
FILING INSTRUCTIONS:	File this OM in numerical sequence with other current Office Memoranda.
COPIES:	Copies of this Office Memorandum may be obtained through the Office of Financial and Management Analysis.



SMITHSONIAN INSTITUTION

SD Zit

OFFICE MEMORANDUM 855

November 18, 1992

EARLY DISMISSALS OF EMPLOYEES FOR HOLIDAYS

1. DEFINITION. Early dismissal on the eve of a holiday is an administratively authorized early group dismissal of Smithsonian Institution employees.

2. PROCEDURES. The Secretary or Under Secretary, may approve early dismissal of Smithsonian employees on the eve of a holiday. Such approvals will normally be limited to major holidays, such as Thanksgiving and Christmas. On those occasions, the Secretary or Under Secretary will set a time for release and the Office of Human Resources will notify Smithsonian organization units to ensure that all employees are treated equitably.

Heads of Smithsonian organization units may not unilaterally grant early release of their employees for holidays. Such actions can result in inconsistent treatment among SI employees.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 218,
Overview

March 27, 2013

**DRUG AND ALCOHOL TESTING AND MEDICAL EXAMINATIONS
FOR COMMERCIAL DRIVERS**

Overview	
Purpose	2
Policy	2
Definitions	2
 Section A, Drug and Alcohol Testing	
Purpose	7
Policy	7
Regulations	8
Scope	8
Program Responsibilities	9
Drug and Alcohol Testing as a Condition of Employment	11
Treatment of Substance Abuse	13
Testing Procedures	14
Positive Drug Tests	18
Consequence of Violations	19
Record Keeping	21
Training	21
 Section B, Medical Examinations	
Purpose	23
Basis	23
Policy	24
Responsibilities	24
Medical Examinations as a Condition of Employment	27
When Examinations and Certifications Are Required	27
Process	28
Failure to Meet Medical Requirements	29
Record Keeping	30
Related Policies	30

Purpose

The Smithsonian Institution (SI) is committed to maintaining a drug- and alcohol-free workplace, and a safe and healthful environment for its staff and the public. This directive establishes policy and outlines responsibilities and procedures for providing medical examinations that comply with Department of Transportation (DOT) regulations, and for testing commercial drivers at the Smithsonian for drugs and alcohol.

Policy

Participation in the Smithsonian's medical examination program and the drug and alcohol testing program is a requirement for every commercial driver and is a condition of employment.

Every commercial driver and supervisor must sign an acknowledgement indicating that they have received and read this directive.

This directive provides an overview of applicable federal law and regulations requiring medical examinations and drug and alcohol testing of commercial drivers (as defined below). In case of any change in applicable law or regulations, or other inconsistency between this policy and applicable law or regulations, the applicable law and regulations shall control. This directive does not create any agreement, benefit, entitlement, privilege, or right, whether substantive or procedural, that a person may rely upon in any legal proceeding against the United States or the Smithsonian or its officers.

Definitions

Alcohol. An intoxicating agent that includes ethyl alcohol or other low molecular weight alcohols, such as methyl or isopropyl alcohol, and is present in beverages, mixtures, preparations, or medications.

Chain of Custody. Procedures used to account for the integrity of each urine specimen by tracking its handling and storage from point of collection to final disposition.

Collection Site. The place where individuals present themselves for the purpose of providing breath or body

Definitions
(continued)

fluid (urine) to be analyzed for alcohol or controlled substances. The site must have all necessary personnel, materials, equipment, facilities, and supervision to provide for the collection, security, temporary storage, and transportation of the samples to a laboratory.

Commercial Motor Vehicle. A motor vehicle or combination of motor vehicles used within or between states to transport passengers or property if the motor vehicle:

- has a gross combination weight rating of 26,001 or more pounds, inclusive of a towed unit with a gross weight rating of more than 10,000 pounds
- has a gross vehicle weight rating of 26,001 or more pounds
- is designed to transport 16 or more passengers, including the driver
- is of any size and is used to transport materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act that requires the motor vehicle to be placarded under the Hazardous Materials Regulations (49 *Code of Federal Regulations* [CFR] 172, Subpart F)

This is the same definition of a commercial motor vehicle that determines whether an individual must possess a Commercial Driver's License (CDL) to operate the vehicle; this definition incorporates any changes in applicable law or regulation defining whether an individual must possess a CDL.

Commercial Motor Vehicle Driver or commercial driver. These terms describe all SI employees who drive commercial motor vehicles on behalf of the Smithsonian on public roads within the United States. Non-employees may not operate commercial motor vehicles on behalf of the Smithsonian.

Definitions
(continued)

Controlled Substance. All substances listed on Schedules I through V as they may be revised from time to time (21 CFR 1308). Applicants and drivers will be tested through urinalysis to detect the presence of five drugs (controlled substances) or classes of drug:

- marijuana
- cocaine
- opiates
- amphetamines
- phencyclidine (PCP)

Drug. A controlled substance as defined in this section and in 49 CFR, Part 40.

Medical Review Officer. The licensed physician (i.e., medical doctor or doctor of osteopathy) who is responsible for receiving laboratory results generated by the drug-testing program of the Smithsonian Institution. The medical review officer must have knowledge of substance abuse disorders and appropriate medical training to interpret and evaluate confirmed positive test results and the medical history of an individual, together with any other relevant biomedical information.

Refusal to Submit. The failure of an employee to provide an adequate breath or urine specimen for testing without a valid medical explanation after he or she has received notice of the requirement to be tested by the provisions of this policy, or conduct that obstructs the testing process.

Safety-Sensitive Function. All time spent driving commercial vehicles or performing functions such as those listed below until the commercial driver is officially relieved from duty and from all responsibility for performing work:

Definitions
(continued)

- Time at any facility or property or on any public property waiting to be dispatched, unless the commercial driver has been relieved from duty by the Smithsonian
- All time inspecting, servicing, or conditioning any commercial motor vehicle at any time
- All of the time, other than driving time, spent in a commercial vehicle except for time resting in a sleeper berth
- All of the time spent loading or unloading a vehicle, supervising, or assisting in loading or unloading the vehicle, attending a vehicle while it is being loaded or unloaded, remaining in readiness to operate the vehicle, or in giving or receiving receipts for shipments loaded or unloaded
- All time performing driver requirements related to accidents
- All time spent repairing, obtaining assistance, or remaining in attendance for a disabled vehicle

Substance Abuse Professional. A licensed physician or a licensed and certified psychologist, social worker, employee assistance professional, or addiction counselor (certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission), with knowledge of and clinical experience in the diagnosis and treatment of drug- and alcohol-related disorders. At the Smithsonian, Employee Assistance Program professional staff members fill this role.

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SMITHSONIAN DIRECTIVE 218,
Section A,

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Smithsonian
Institution

**DRUG AND ALCOHOL TESTING AND MEDICAL EXAMINATIONS
FOR COMMERCIAL DRIVERS**

Section A: Drug and Alcohol Testing

Purpose	7
Policy	7
Regulations	8
Scope	8
Program Responsibilities	9
Drug and Alcohol Testing as a Condition of Employment	11
Treatment of Substance Abuse	13
Testing Procedures	14
Positive Drug Tests	18
Consequences of Violations	19
Record Keeping	21
Training	21

Purpose

This section of Smithsonian Directive (SD) 218 establishes policy and outlines responsibilities and procedures for testing commercial drivers at the Smithsonian for controlled substances and alcohol.

Policy

Drug or alcohol use by any SI vehicle driver poses a serious threat to the safety of the driver, other staff members, the public, and property. While on Smithsonian premises or operating an SI vehicle, commercial drivers are prohibited from:

- the unlawful manufacture, distribution, possession, or use — including being on duty under the influence — of controlled substances

Policy (continued)

- unauthorized use, distribution, possession, or having detectable levels of alcohol in his or her system

Also prohibited is the operation of a motor vehicle when under the influence of medically prescribed drugs that may impair a driver's performance, alertness, or judgment.

Commercial drivers who violate these prohibitions may be subject to disciplinary action, up to and including termination, in compliance with Smithsonian policy and the collective bargaining agreement between the Smithsonian Institution and the American Federation of Government Employees, as applicable.

Regulations

The Smithsonian Institution complies with federal regulations related to drug and alcohol testing of persons who drive commercial motor vehicles. These regulations require that all employers of commercial drivers, including the Smithsonian, implement mandatory drug and alcohol testing of drivers who operate commercial motor vehicles.

The testing follows regulatory guidelines and procedures that are designed to protect the dignity of and fairness to each commercial driver and applicant, as well as to detect unauthorized or illegal use of drugs or alcohol. Details of the testing requirements and other procedures can be found in the *Federal Motor Carrier Safety Regulations* (FMCSR), 49 CFR, Parts 40, 382, 383, and 390–397, which are published by the U.S. DOT, Federal Highway Administration (FHWA).

Scope

Drug and alcohol testing requirements apply to all SI employees who drive commercial motor vehicles on behalf of the Institution on public roads within the United States. A person is covered whether the driving occurs on a regular basis or occasionally. Requirements for drug testing also apply to applicants (whether or not the applicant is already a Smithsonian employee) for positions that involve driving commercial motor vehicles.

Scope (continued)

Commercial drivers are subject to random, reasonable-suspicion, post-accident, return-to-duty, and follow-up drug and alcohol testing.

**Program
Responsibilities**

The **Office of Safety, Health, and Environmental Management (OSHEM)** has primary responsibility for administering, monitoring, facilitating, and answering questions pertaining to this policy. OSHEM arranges appropriate training for supervisors and ensures that all testing and record-keeping procedures meet DOT requirements. The director of OSHEM appoints a senior medical staff member to serve as the Drug and Alcohol Testing Program Administrator.

The **Office of Human Resources (OHR)** maintains a database of Smithsonian commercial motor vehicle driver positions. In addition, OHR:

- ensures inclusion of CDL and drug-testing requirements in vacancy announcements and job descriptions
- advises on appropriate corrective or adverse actions for violations of this policy
- notifies the Drug and Alcohol Testing Program Administrator of employees tentatively selected for positions requiring CDLs, as well as SI employees being newly assigned to or separated from positions requiring CDLs.

Employee Assistance Program (EAP) staff members serve as substance abuse professionals for the Smithsonian by providing short-term and emergency professional counseling, problem assessment, referral to community resources, and continuing support.

The **Drug and Alcohol Testing Program Quality Assurance Committee** meets as needed to review all aspects of the SI drug and alcohol testing program for commercial drivers. The committee consists of representatives from Occupational Health Services, OSHEM; Labor Relations and the EAP; OHR;

**Program
Responsibilities**
(continued)

Transportation Operations Branch, Office of Facilities Management; Office of General Counsel (OGC); Office of Protection Services (OPS); Office of Equal Employment and Minority Affairs (OEEMA); and the American Federation of Government Employees local.

The commercial driver coordinator is an Office of Facilities Engineering and Operations (OFEO) employee who ensures that each commercial driver is aware of this policy by:

- notifying each driver of this directive
- obtaining the commercial driver's written acknowledgement of receipt of this directive
- scheduling appropriate training.

Smithsonian units employing commercial drivers enforce this policy by:

- identifying to OHR the positions that require a CDL
- ensuring that drivers are available for testing
- documenting reasonable-suspicion determinations
- taking appropriate corrective or adverse action in response to violations of this policy
- cooperating with the commercial driver coordinator to comply with this directive.

Commercial drivers are responsible for complying with this policy by refraining from:

- abusing controlled substances. A driver may not use a controlled substance illegally or perform safety-sensitive functions (as described in the "Definitions" section in pages 2–5 of this directive) when under the influence of medically prescribed drugs that may impair performance, alertness, or judgment

**Program
Responsibilities**
(continued)

- reporting to or remaining on duty performing safety-sensitive functions while having a blood-alcohol concentration (BAC) of 0.02 or greater
 - using alcohol while performing safety-sensitive functions
 - possessing alcohol while operating a commercial vehicle, unless the alcohol is manifested as a part of a shipment. A driver may not carry any type of alcohol, including alcohol contained in mouthwash, aftershave, or cough syrup, in the cab of the vehicle
 - performing safety-sensitive functions within four hours after using alcohol
 - using any alcohol for a period of eight hours following an accident, unless the driver has already received a post-accident test
 - refusing to submit to or failing to cooperate fully in a required drug or alcohol test, including a random, post-accident, reasonable-suspicion, return-to-duty, or follow-up test
-

**Drug and Alcohol
Testing
as a Condition
of Employment**

Participation in the SI drug and alcohol testing program is a requirement for each commercial driver and is, therefore, a condition of employment.

Commercial drivers are responsible for refraining from drug or alcohol use that could interfere with their alertness, coordination, reliability, conduct, or judgment. Federal Highway Administration (FHWA) regulations establish specific prohibitions, listed under the responsibilities of commercial drivers, concerning drug and alcohol use. Commercial drivers are responsible for cooperating in required drug and alcohol testing procedures.

A commercial driver who is taking medication labeled with a warning that the substance may cause drowsiness or impair the ability of the user to operate machinery must obtain a description of the effects that the medication may have on the driver's ability to

**Drug and Alcohol
Testing
as a Condition
of Employment**
(continued)

perform his or her duties. The description must come from a licensed health care professional familiar with the driver's work-related responsibilities, and the driver must submit this description to Occupational Health Services, OSHEM, for review.

SI supervisors will consult the Drug and Alcohol Testing Program Administrator to decide whether the driver should be relieved of safety-sensitive functions. The Smithsonian will treat all information regarding the health of an employee, including information about prescribed medications, as is described below.

A commercial driver who fails to comply with his or her responsibilities (e.g., receives confirmation of a positive test for drugs or alcohol, or refuses to take a required test) will be relieved immediately of safety-sensitive functions and may be subject to disciplinary action up to and including termination.

Refusal to submit to drug or alcohol testing includes, but is not limited to:

- refusal to sign the consent form during alcohol testing
- inability to provide sufficient quantities of breath or urine to be tested without a valid medical explanation
- tampering with and/or attempting to adulterate a specimen or collection procedure
- failure to report to the collection site within the time allotted for the collection
- leaving the scene of an accident willingly before a test has been conducted
- refusal to provide a specimen

**Treatment of
Substance Abuse**

As noted under the “Consequences of Violations” section below, a commercial driver who fails to meet his or her responsibilities (e.g., has driven under the influence of alcohol or used controlled substances) may also be subject to disciplinary action, up to and including termination, in lieu of, or in addition to, referral for evaluation and treatment. Whether the driver has voluntarily admitted to a substance abuse problem or has acknowledged one only after referral for testing is one consideration in determining whether to retain a driver while the driver seeks treatment or remove the driver.

When a driver acknowledges a substance abuse problem and requests assistance:

- the supervisor refers the employee to the EAP and consults with the EAP counselor
- the driver decides whether to seek diagnosis and accept treatment through the EAP for the substance abuse problem
- the Smithsonian grants sick leave, annual leave, and/or leave without pay to accommodate treatment recommended by appropriate treatment professionals

If the Smithsonian retains the driver pending referral for evaluation and treatment, then the driver’s return to performance of safety-sensitive functions is conditioned upon:

- the EAP counselor verifying that the diagnosis and prescribed treatment of the condition of the driver are appropriate
- the driver completing or actively participating in all recommended counseling and/or rehabilitation
- the concurrence of the treatment provider and the EAP counselor that the driver has completed sufficient rehabilitation to return safely to duty
- the driver passing a return-to-duty test

**Treatment of
Substance Abuse**
(continued)

After returning to duty, the driver may continue to perform safety-sensitive functions, subject to:

- successful participation in and completion of any recommended after-care program
- submission to at least six random drug and alcohol tests during the next 12 months. Such tests may continue for up to 60 months
- a last chance agreement that holds any prospective removal in abeyance while the driver seeks treatment and rehabilitation

Testing Procedures

All applicant and SI employee drug and alcohol tests will follow the collection, chain-of-custody, and reporting procedures set forth in 49 CFR, Part 40.

Pre-employment, Pre-duty, or Applicant Testing. An applicant conditionally selected for a position that requires a CDL (including an incumbent SI employee selected for a position that requires a CDL) will be required to pass a urine drug test as a condition of employment. A job applicant who tests positive will not be considered for a Smithsonian position requiring a CDL for six months following the positive test.

Any offer of employment will be contingent upon the ability of the person to pass all required medical reviews, including the drug test. Under no circumstances may an individual be newly assigned to perform safety-sensitive functions until confirmation of a negative test result is received.

Reasonable Suspicion. When an SI commercial vehicle driver is having work performance problems, displaying behavior that may be drug- or alcohol-related, or is otherwise displaying conduct that may be violating this policy, the supervisor or other trained official will require the driver to submit to a breath test and/or urinalysis.

Testing Procedures
(continued)

Supervisor's Role When Confronted with Reasonable Suspicion. Supervisors must take action when drug or alcohol use by a commercial vehicle operator is suspected. A supervisor will:

- offer the driver an immediate opportunity to explain satisfactorily the observations of the supervisor and keep the driver under direct observation until the situation is resolved
- after observing and/or talking to the driver and determining that he or she may be under the influence of alcohol or drugs, require the driver to submit immediately to a breath test and/or urinalysis. Should the driver refuse to submit to testing for any reason, the driver will be informed that continued refusal will result in disqualification from performing any safety-sensitive function and may lead to disciplinary action, up to and including termination
- ask the driver to release all evidence — i.e., materials suspected of containing drugs or alcohol — observed by the supervisor, dispatcher, or Drug and Alcohol Testing Program Administrator, or a designee, for further testing. Receipts with signatures of the supervisor and the provider will be issued
- remove, or cause the removal of, the driver from the SI vehicle, ensure that the driver is transported to an appropriate collection site, and offer transportation home or to another place of lodging. Under no circumstances will the driver be allowed to drive an SI vehicle until confirmation of a negative test result is received.

The supervisor or other trained official will, within 24 hours, document the facts related to the behavior or performance problems, and present them to the Smithsonian Drug and Alcohol Testing Program Administrator and to the driver.

Post-accident Testing. FHWA regulations define an accident as an incident that results in:

Testing Procedures
(continued)

- the death of a human being
- bodily injury to a person who, because of the injury, immediately receives medical treatment away from the scene of the accident
- one or more of the vehicles being towed from the scene of the incident

Drug and alcohol testing is mandatory when an accident results in a fatality. When an accident results in an injury requiring medical treatment away from the scene, or results in a vehicle being towed, the SI driver must obtain a drug and alcohol test only on receiving a citation indicating that the driver is responsible for causing the accident.

Federal regulations place the burden of compliance with post-accident drug and alcohol testing regulations on the driver. After an accident, the driver must immediately contact his or her supervisor and follow directions for breath and urine testing. The driver must be readily available for such testing or a supervisor may deem him or her to have refused to submit to testing.

No alcohol may be consumed by the driver for eight hours after an accident or until drug and alcohol tests have been conducted. When seriously injured and unable to provide a specimen at the time of the accident, the driver must subsequently authorize release of hospital reports and other documents that may indicate the presence of drugs or alcohol in his or her system.

Random Testing. Commercial drivers are subject to random drug and alcohol testing. Random testing of at least 50 percent of commercial drivers will be reasonably spaced over any 12-month period.

Employees will have no advance knowledge that they are to be tested at a particular time. They will be selected for testing by a scientifically valid, random-number-generation method and identified by a unique

Testing Procedures
(continued)

number, such as a payroll identification number, rather than by name. After selection for testing, employees will be returned to the test pool, thereby ensuring each employee an equal chance of being selected for testing on each occasion. Unannounced random testing will be conducted on all work shifts throughout the calendar year. Once notified, a driver must proceed immediately to the assigned collection site.

Return-to-duty Testing. Before a driver returns to duty requiring performance of safety-sensitive functions after engaging in conduct prohibited by this policy, the driver must receive confirmation of a negative result from a controlled substance urinalysis test and/or undergo a return-to-duty alcohol test that results in a blood-alcohol concentration of less than 0.02.

Follow-up Testing. After a determination that a driver is in need of assistance in resolving problems associated with use of drugs or alcohol, the Drug and Alcohol Testing Program Administrator and the driver's supervisor will ensure that the driver is subject to unannounced follow-up testing. The frequency and number of follow-up tests will be determined by the Drug and Alcohol Testing Program Administrator, and will consist of at least six tests during the first 12 months following the driver's return to duty. Follow-up testing will not exceed 60 months.

Breath-Alcohol Testing will be conducted either on site or at a pre-arranged location by a qualified Breath Alcohol Technician, following the procedures described in 49 CFR, Part 40. Refusal to complete and sign the testing form or refusal to provide breath will be considered a positive test and the driver will be removed from safety-sensitive functions until the matter is resolved.

Urine Specimen Collection will be conducted according to applicable federal laws and regulations. The collection procedures will be designed to ensure the security and integrity of the specimen provided by each driver, and will strictly follow federal chain-of-custody guidelines. Every reasonable effort will be

Testing Procedures
(continued)

made to maintain the dignity of each driver submitting a specimen for analysis according to these procedures.

Positive Drug Tests

Drug test analyses from a laboratory approved by the U.S. Department of Health and Human Services (DHHS) will be forwarded directly to the Medical Review Officer (MRO) assigned through contractual agreement by the Drug and Alcohol Testing Program Administrator.

The MRO will contact any driver who tests positive for the presence of a controlled substance. The driver will be allowed to present medical documentation to explain any permissible use of a drug. The Smithsonian will not be a party to or have access to discussions between the driver and the MRO.

When legitimate, medically supportable reasons exist to explain the positive result, the MRO will report the test result to the Smithsonian as a negative. The MRO will report verified positive results to the Drug and Alcohol Testing Program Administrator.

Within 72 hours after the SI driver has been notified of a positive test result for drugs, he or she may request a retest of the split sample. A written and signed request must be provided to the MRO, who will initiate new laboratory analysis.

The test of the split sample will be conducted by a second DHHS-certified laboratory at the employee's expense, including shipping and handling charges. Should a different result be detected by the second laboratory, the MRO will void the entire test and the Drug and Alcohol Testing Program Administrator will be notified. A new test of the driver may be initiated, as appropriate.

Upon receiving notification of a confirmed positive test, the Drug and Alcohol Testing Program Administrator will immediately release the test results to Smithsonian officials with the need to know, such as the employee's supervisor and advising personnel specialists.

**Consequences
of Violations**

Any SI driver found to have a BAC of 0.02 or more will not perform safety-sensitive functions for at least 24 hours. The driver may be relieved from duty and charged as absent without leave (AWOL), assigned to non-safety-sensitive functions, or granted leave, as appropriate.

When an SI driver has a BAC of more than 0.02, but less than 0.04, the Smithsonian will inform the driver of the availability of the Employee Assistance Program, in which he or she may participate on a voluntary basis.

An SI commercial driver who receives a positive drug test or an alcohol test result indicating a BAC of 0.04 or higher will be immediately relieved of safety-sensitive functions. The supervisor, MRO, and/or the Drug and Alcohol Testing Program Administrator will refer the driver to the Employee Assistance Program. Before being permitted to resume safety-sensitive duties, the driver must:

- undergo evaluation by a program counselor;
- complete or actively participate in all recommended counseling and/or rehabilitation;
- receive the concurrences of the treatment provider and EAP counselor that the driver has completed sufficient rehabilitation to return to duty safely; and
- pass a return-to-duty test.

After returning to safety-sensitive functions, the driver must continue to participate in any SI-recommended after-care program and submit to at least six random drug and alcohol tests during the next 12 months. Follow-up testing may be conducted for up to 60 months. Failure to adhere to these requirements may result in disciplinary action, up to and including termination. Refusal to submit to a test constitutes a positive test result.

A commercial driver with a positive test result may be subject to referral for evaluation and treatment, as well

**Consequences
of Violations**
(continued)

as disciplinary action, up to and including termination. A commercial driver is subject to disciplinary action for failure to participate in follow-up testing.

A commercial driver who has been relieved of safety-sensitive functions may:

- request and receive leave
- be assigned temporarily to perform other duties
- be placed on leave through suspension procedures
- be reassigned, disciplined, demoted, or separated from employment with the Smithsonian Institution

When necessary, an SI driver may be placed in non-duty status with pay, pending implementation of one of these alternatives.

The Smithsonian will determine an appropriate course of action on a case-by-case basis, relying on considerations such as:

- the reason for relieving the driver of safety-sensitive functions, such as an admission by the driver of a problem, a request for leave, or a refusal to test
- the willingness of the driver to seek professional assistance for substance abuse
- the advice of medical professionals
- the past work record of the driver
- the work needs of the organization and the nature of the duties of the driver, such as whether driving commercial vehicles is a major function of the position

All disciplinary or adverse actions must comply with SI policy and collective bargaining agreements governing such actions. Supervisors should consult with OHR-

**Consequences
of Violations**
(continued)

LER for assistance in determining the most appropriate course of action in each situation.

Record Keeping

Smithsonian copies of records will be retained as provided by the *Federal Motor Carrier Standards Regulations* (FMCSR), including without limitation that:

- records of positive drug tests or alcohol tests showing a BAC of 0.02 or greater, or refusals to take required alcohol or drug tests, for five years
- records of referrals to the Employee Assistance Program, for five years
- records of specimen collection, collector training, and documentation of employee/supervisor training, for two years
- records of negative drug and/or alcohol tests (where the BAC is less than 0.02), for one year

The Smithsonian may release the above identified records as authorized by FMCSR or when requested by the National Transportation Safety Board as part of an accident investigation. FMCSR authorizes the release of such records during an administrative procedure (such as a grievance, appeal, or unemployment compensation proceeding) arising from the results of a test for controlled substances or alcohol. Releases other than those authorized by FMCSR require the written permission of the SI employee, who is entitled to obtain copies of all records pertaining to his or her use of controlled substances or alcohol, including all records pertaining to personal controlled-substance or alcohol tests.

Training

Commercial drivers, dispatchers, and their supervisors will receive training that emphasizes:

- their responsibilities under this policy

Training (continued)

- the effects of drugs and alcohol on the health, work, and personal life of an individual
- available methods of intervention when problems are identified
- the right of the driver to representation

Training for supervisors and dispatchers will include instruction on how to make sound decisions about referring employees for testing when there is reasonable suspicion of drug or alcohol use.



SMITHSONIAN DIRECTIVE 218,
Section B

XXXXXX xx, xxxx

**DRUG AND ALCOHOL TESTING AND MEDICAL EXAMINATIONS
FOR COMMERCIAL DRIVERS**

Section B: Medical Examinations

Purpose	23
Basis	23
Policy	24
Responsibilities	24
Medical Examinations as a Condition of Employment	27
When Examinations and Certifications Are Required	27
Process	28
Failure to Meet Medical Requirements	29
Record Keeping	30
Related Policies	30

Purpose	This section of SD 218 outlines responsibilities and establishes policy for providing medical examinations for Smithsonian commercial drivers.
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Basis	<p>Possession of a CDL to operate a commercial motor vehicle in interstate or intrastate commerce is a qualification requirement for certain Smithsonian positions. DOT <i>Federal Motor Carrier Safety Regulations</i> prescribe specific requirements for CDL holders.</p> <p>Among other requirements, each CDL driver must obtain a medical examination at least once every two years to determine and certify whether the driver is physically and mentally fit to drive commercial vehicles.</p> <p>The regulations require that the medical examiner check for a variety of medical conditions. To qualify for a CDL, the driver must receive medical certification that</p>
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Basis (continued)

he or she has no condition that would interfere with his or her ability to control or drive a motor vehicle safely.

The Smithsonian provides the medical examinations for commercial drivers in order to:

- ensure that SI drivers receive consistent, high-quality CDL physical examinations conducted by physicians, physician assistants, and/or nurse practitioners, who are knowledgeable about the DOT regulations concerning such examinations, and are experienced in performing such examinations
 - help the Smithsonian ensure that its drivers are medically able to drive without endangering themselves or others
-

Policy

The Smithsonian will provide required medical examinations for each SI driver required by the Smithsonian to have a CDL. The Smithsonian pays the costs of and designates the physician, physician assistant, and/or nurse practitioner to conduct the examination. *Smithsonian CDL drivers may not select another health care provider for the examination.*

Each SI unit employing CDL drivers pays for the physical examinations for its employees. At least annually, or as prices and procedures change, the Smithsonian will issue a list of fees for CDL medical examinations (see [SD 222](#), *Smithsonian Health and Wellness Services*).

OSHEM conducts the medical examinations for employees in the Washington, DC metropolitan area. SI units outside the Washington, DC metropolitan area may elect to contract separately for these services in accordance with the provisions of [SD 222](#).

Responsibilities

OSHEM has primary responsibility for administering, monitoring, facilitating, and revising this policy. Through Occupational Health Services, OSHEM arranges medical examinations, advises on commercial drivers'

Responsibilities
(continued)

medical qualifications, and ensures that all examination and record-keeping procedures meet DOT requirements.

The Office of Human Resources:

- ensures inclusion of CDL and medical examination requirements as a condition of employment in vacancy announcements and job descriptions. This includes the requirement for periodic medical examinations and certifications
- ensures that job offers are conditional until such time that medical examination requirements are met, and notifies the selecting official of the job candidate's need to meet the medical examination requirements prior to a final offer and entry into the position
- notifies OSHEM of tentative job candidates (including SI employees newly selected or reassigned) for positions requiring CDLs
- provides to the Office of Facilities Management and Reliability (OFMR) Transportation Branch a copy of a newly hired employee's application or resume and any attendant documents that provide certification of driving record and proof of CDL possession
- maintains in the personnel database a position identifier which identifies each Smithsonian position that requires a CDL
- advises on alternatives when an SI driver does not meet CDL medical requirements, and on appropriate corrective or adverse action if a driver does not comply with medical examination requirements
- notifies OSHEM of SI employees who are separating from positions requiring CDLs

Responsibilities
(continued)

The **Transportation Branch, Office of Facilities Management and Reliability**, maintains drivers' qualifications files, including copies of the medical examiner's certificate of each driver's qualification to drive a commercial vehicle.

SI units employing commercial drivers:

- identify positions that require a CDL and ensure that the requirement is reflected in the job description
- notify commercial drivers of this policy
- arrange for medical examinations, through OSHEM, for prospective drivers provisionally selected for the job prior to entry into the position
- cooperate in scheduling on-board drivers for medical examinations
- fund the medical examinations for their drivers, reimbursing OSHEM through the Smithsonian inter-unit reimbursement process
- consult with OHR and the OSHEM physician, physician assistant, nurse practitioner, and/or occupational health nurse when there is a question about an employee's capacity to meet the medical requirements of the job
- provide alternative assignments or placements for, grant leave to, and/or separate commercial drivers who do not meet CDL medical requirements
- take appropriate corrective or adverse action if an SI driver does not comply with medical examination requirements

Commercial drivers are responsible for cooperating in medical examinations and for notifying the Smithsonian if any medical condition or treatment interferes with their alertness, coordination, reliability, conduct, judgment, or other ability to drive.

**Medical
Examinations
as a Condition
of Employment**

Participation in the Smithsonian's medical examination program is a requirement for each commercial driver and is, therefore, a condition of employment.

Commercial drivers are responsible for cooperating with required medical examination procedures. A commercial driver advises OSHM if he or she has a condition or is taking medication that, according to the driver's physician or the label on the medication, may impair the individual's ability to drive.

Smithsonian supervisors will consult the OSHM physician and/or medical case manager to decide whether and for how long the driver should be relieved of safety-sensitive functions. The Smithsonian will treat all information regarding the health of an employee, including information about prescribed medications, as described below.

A commercial driver who fails to comply with his or her responsibilities will be relieved immediately of safety-sensitive functions and may be subject to disciplinary or adverse action up to and including termination. Such noncompliance includes, but is not limited to, a driver refusing to comply with medical examinations, failing to obtain medical certification, or failing to notify OSHM of his or her impairment due to a condition or medication.

**When Examinations
and Certifications
Are Required**

Each commercial driver must be medically examined and certified:

- before final selection for a position requiring a CDL
- at least once every two years while holding a position requiring a CDL
- before resuming safety-sensitive duties if the employee has been relieved of such duties because of a medical condition
- whenever there is a direct question about an employee's continued capacity to meet CDL medical requirements. An examination is appropriate when

**When Examinations
and Certifications
Are Required**
(continued)

the driver's ability to perform his or her normal driving duties has been impaired by a physical or mental injury or disease. For example, the examining physician may schedule examinations more frequently than once every two years when monitoring a particular condition or when a new condition arises between medical examinations

Process

The following provides an overview of the process for medical evaluations for CDL drivers.

Step 1: The Supervisor

- identifies the position as requiring a CDL, reflects the requirement in the job description, and informs OHR of the requirement
- consults OSHEM when there is a question about an employee's capacity to meet the medical requirements of the job

Step 2: OHR

- ensures that the CDL and medical examination requirements are reflected in the job description and any vacancy announcement
- notifies OSHEM of each individual provisionally selected or expected to be assigned to a position requiring a CDL

Step 3: OSHEM schedules the individual selected or the SI employee for initial and/or ongoing medical examinations.

Step 4: Driver cooperates in the scheduling and the examination.

Step 5: OSHEM, Occupational Health Services

- conducts and/or oversees medical examinations consistent with DOT guidelines

Process (continued)

- issues to the Transportation Branch, the SI employee, and the supervisor a medical certification that the driver has no condition that would interfere with his or her ability to control or drive a motor vehicle safely

OR

- advises Smithsonian officials with the need to know, such as the SI employee's supervisor and advising personnel specialists, that the employee does not currently meet the medical requirements for a CDL driver

Step 6: Supervisor

- *if the SI driver is certified to drive*, keeps a copy of the medical examiner's certificate
- *if the SI driver is not certified to drive*, relieves the driver of safety-sensitive functions, and, in consultation with OHR, either provides alternative assignments or placement for, grants leave to, and/or separates drivers who do not meet CDL medical requirements

**Failure to Meet
Medical
Requirements**

An employee who does not meet the medical requirements for commercial drivers must be relieved of safety-sensitive functions. A commercial driver who has been relieved of safety-sensitive functions may:

- request and receive leave
- be assigned temporarily to perform other duties
- be placed temporarily in a non-duty status
- be reassigned or demoted to a position that does not require driving
- be separated from employment
- apply for disability retirement, if eligible

**Failure to Meet
Medical
Requirements**
(continued)

When necessary, a driver may be placed in non-duty status with pay pending implementation of one of these alternatives. A driver may submit, and OSHM will review and consider, medical documentation from his or her personal physician or healthcare practitioner.

Any adverse action must comply with Smithsonian policy and collective bargaining agreements governing such actions. Supervisors should consult the Office of Human Resources for assistance in determining the most appropriate course of action in each situation.

Record Keeping

Medical records for examinations authorized by this directive are maintained by OSHM. Original records of services obtained through contractual arrangements from non-Smithsonian healthcare providers must be forwarded to OSHM for retention in the Institution's medical records system.

Information from medical records is sensitive information that may be released only as authorized by the written permission of the SI employee or as required by and in accordance with applicable law or regulations. The employee is entitled to obtain copies of his or her own records.

Related Policies

Supervisors and employees also need to be familiar with the guidelines provided through [SD 421](#), *Motor Vehicle Management*. [SD 222](#), *Smithsonian Health and Wellness Services*, provides guidelines on contracted medical services.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 218, March 14, 2007
Office of Safety, Health, and Environmental Management (OSHEM)
Indefinite. Subject to review for currency 24 months from date of issue



SMITHSONIAN DIRECTIVE 224,

September 16, 2009,

Date Last Declared Current: December 7, 2011

IDENTITY MANAGEMENT PROGRAM

Purpose	1
Definitions	1
Background	2
Policy	3
Roles and Responsibilities	4
Handbooks	5
References	5

Purpose

The Smithsonian's Identity Management Program encompasses identity and documentation validation, background investigation, credentialing, and physical access to Smithsonian Institution (SI) facilities. Logical access to SI information systems will not be addressed in this program, but will be adopted in future Office of the Chief Information Officer (OCIO) guidance.

This program is consistent with the Institution's responsibility for the care of the national collections and for the safety and security of visitors and employees. This program is intended to determine whether employees and persons selected for employment or association with the Smithsonian are trustworthy, reliable, and of good character, and whether their employment or association might in some way pose a threat to the Institution and its visitors, staff, or collections.

Definitions

Employee: Federal employees, as defined in Title 5 *United States Code* (U.S.C.) §2105, and Smithsonian trust employees including Smithsonian Enterprises (SE) employees.

Affiliated Staff: Individuals other than employees who perform duties for the Smithsonian Institution or who operate on Smithsonian property, including but not limited to:

Definitions
(continued)

- Contractors (paid with federal or trust [including SE] funds)
- Volunteers
- Interns and Fellows
- Friends of the National Zoo (FONZ) employees
- Visiting researchers and students
- Research Associates and Collaborators
- The Smithsonian Associates (TSA) educators

Smithsonian-Controlled Facilities: For the purposes of this directive, SI-controlled facilities shall be considered Smithsonian owned buildings or leased spaces, SI-controlled commercial space shared with non-Smithsonian tenants, and SI-owned contractor-operated facilities, including laboratories and educational institutions. (Please see the *SI Identity Management Handbook*, which is available at the Office of Protection Services [OPS] webpage on PRISM, for additional information on this type of property, as well as for examples of SI facilities that meet these criteria.)

Background

The Smithsonian Institution performs background investigations on employees and some contractors. However, the Smithsonian did not previously perform background investigations on other individuals associated with the Smithsonian.

In response to the terrorist attacks on the United States of America, the President issued a series of initiatives, calling for increased security across Government agencies. One of these initiatives, Homeland Security Presidential Directive-12 (HSPD-12), establishes the criteria for secure and reliable identification issuance based on a sound suitability determination.

Smithsonian Directives (SDs) 212 and 213, *Federal Personnel Handbook* and *Trust Personnel Handbook*, respectively, previously addressed background investigations and personnel security policies for both federal and trust employees, as appropriate. SD 420, Security Operations and Policies, and the associated *Security Handbook* addressed the procedures required to obtain an SI credential and to ensure access control.

Background
(continued)

This directive supplements SDs 212 and 213 with personnel security policy for employees and all other affiliated staff, and replaces all previously issued guidance on SI credential issuance and access control.

Policy

The SI Identity Management Program will be consistent with the control objectives of HSPD-12. All employees and other affiliated staff associated with the Institution will receive an appropriate background investigation and SI credential under the following conditions:

- Their association with the Smithsonian is for more than 30 days, and they require access to staff-only areas of SI-controlled facilities.
- They are considered vendors, provide regular delivery services or recurring services (as a contractor), or are other individuals, such as volunteers, who require intermittent physical access to SI facilities in excess of 30 days.

The level of background investigation may vary based on the position risk level and/or required level of access. However, all employees and affiliated staff will receive a pre-appointment screening prior to granting their access to staff-only areas of SI-controlled facilities and prior to the issuance of an SI credential. This policy is a condition of an employee's or affiliated staff's employment *or association* with the Smithsonian Institution.

Additionally, prior to receipt of an SI credential and access to staff-only areas of SI-controlled facilities, all employees and affiliated staff must certify that they are aware of the General Security Procedures recognized by the Smithsonian.

All SI employees and affiliated staff must wear their credential at all times while in non-public areas of SI-controlled facilities and property areas. When a facility is closed to the public, staff will visibly wear the SI credential at all times throughout both public and staff areas of the facility.

Policy (continued)

Individuals will not receive a background investigation and SI credential if they are associated with the Smithsonian Institution for less than 30 days. The 30-day period begins the first day the individual has access to SI-controlled facilities and ends exactly 30 days later, no matter the frequency or duration of the activity (i.e., one or five days per week).

Individuals without an SI credential must be escorted by a credentialed employee or affiliated staff member when first entering staff-only areas of SI-controlled facilities. Non-credentialed individuals must access SI-controlled facilities via a screening system (where appropriate), display an SI visitor credential at all times, and be appropriately supervised at all times.

Any misuse, tampering, or unauthorized reproduction of SI credentials is in direct violation of §499 and §701, Title 18, U.S.C., and is subject to criminal charges.

**Roles and
Responsibilities**

Office of Protection Services (OPS)

The OPS is responsible for administering the Identity Management Program. Only specific qualified individuals from OPS have the authority to issue SI credentials and access control cards, and to initiate background investigations.

The risk at a particular facility may be low enough so that a credential and/or appropriate background check may not be necessary for some affiliated staff. However, the requirement for issuance of an SI credential or completion of an appropriate background check can only be waived by the Director, OPS. Generally, waivers would only be approved for groups of persons (by labor category or location) and not for individuals. These requirements cannot be waived for any SI employees (federal, trust, or SE staff). Workers in these labor categories must receive an appropriate background investigation and SI credential if their official association with the Smithsonian Institution is longer than 30 days.

**Roles and
Responsibilities**
(continued)

Unit Directors

SI unit directors are responsible for the daily oversight and enforcement of the Identity Management Program policies and procedures within their unit.

Sponsors

All sponsors of new employees or affiliated staff are responsible for ensuring that all background investigation and credential request paperwork is properly completed in a timely manner. Additionally, all sponsors are responsible for ensuring that all staff under their supervision are aware of the General Security Procedures recognized by the Smithsonian.

Employees and Affiliated Staff

All SI employees and affiliated staff are responsible for complying with the standards, policies, and guidance contained in this directive and in the associated handbooks.

Handbooks

Further details of the Identity Management Program policy and procedures can be found in the *SI Identity Management Handbook*. This document captures the complete process of applicant identification and identifies the required steps for issuance and use of SI credentials and access control procedures. The *SI Identity Management Handbook* briefly describes the background investigation process, but further details and requirements can be found in SD 212 (for federal employees), SD 213 (for trust employees), and the *OPS Personnel Security Handbook* (for all other labor categories).

References

The policy considerations for the SI Identity Management Program are as follows:

- Title 5, *Code of Federal Regulations* (CFR), Part 731: Suitability

References
(continued)

- Homeland Security Presidential Directive-12, Policy for a Common Identification Standard for Federal Employees and Contractors

CANCELLATION:
INQUIRIES:

Not applicable
Office of Protection Services (OPS), Office of Facilities Engineering and Operations (OFEO)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 304

April 24, 2006

GUIDELINES FOR ADMINISTERING INDIRECT COST (OVERHEAD) RATES AND CHARGES

Background	1
Policy	1
Applicability	2
Definitions	2
Indirect Cost Rate System	2
Indirect Cost Rates	3
Auxiliary Activity Rate	5
Waiver of Indirect Cost Recovery for Government Grants	5
Waiver of AS/PO Cost Recovery for Non-government Grants	5
Waiver of Indirect or AS/PO Cost Recovery	6
Responsibilities	6
Applicable Rates and Table of Rate Applicability	7

Background

Indirect costs, or overhead, which are interchangeable terms, are costs incurred for common or joint objectives that cannot be identified readily and specifically with a particular program or activity (e.g., government and non-government sponsored projects). Although these costs cannot be identified directly with a particular program or activity, they are valid and must be recovered from project sponsors or absorbed by the Institution.

Policy

Smithsonian Institution (SI) policy requires that the trust-funded costs of central administrative and service units be recovered through a fair and consistent system of assessing the federal and nonfederal programs that its units serve. This is accomplished through the Institution's indirect cost rate system.

Applicability

This directive applies to all Smithsonian units that conduct government and/or non-government sponsored projects and auxiliary activities. However, this directive does *not* apply to business contracts managed by Smithsonian Business Ventures (SBV).

Definitions

Direct costs are costs that can be identified specifically with a particular sponsored project, program, or other activity of the Institution, and which can be assigned to those activities easily and accurately. Examples of direct costs are:

- salary of a lab technician
- travel to an archaeological site
- materials used to mount an exhibition
- equipment needed for a training program

Indirect costs are costs incurred for the general support of programs or activities that cannot be specifically identified with a particular program or activity. The Institution accumulates seven types of costs into expense pools and determines representative allocation bases to develop indirect cost rates. Expense pool categories include:

- fringe benefits
- grant and contract administration
- core support
- general and administrative costs
- direct operating overhead
- material burden
- central engineering overhead

Administrative Support and Project Oversight (AS/PO) Expenses describe the indirect general and administrative, staff management, and central service function costs associated with performance of a non-government sponsored project.

Indirect Cost Rate System

The primary function of the indirect cost rate system is to identify and to allocate Smithsonian trust-funded fiscal year joint or shared costs to the benefiting

**Indirect Cost Rate
System (continued)**

sponsored projects. By using indirect cost rates, the Institution identifies and recovers each sponsored project's allocable share of indirect costs. Identifying and allocating indirect costs enables the Institution to determine and bill sponsors for the total cost of a project or activity. This information is used to make pricing and budgeting decisions, perform cost/benefit analyses, evaluate the performance of revenue-producing activities, and prepare invoices to sponsors.

Indirect Cost Rates

The indirect cost rate system is made up of Smithsonian Mall rates, Smithsonian Astrophysical Observatory (SAO) rates, and Smithsonian-wide rates.

Smithsonian Mall Rates

The Grants and Contracts Overhead rate is the ratio of pre- and post-award central administrative costs to total sponsored project direct labor and benefits.

The SI General and Administrative rate is the ratio of the Institution's central administrative costs (less an allocation to SAO) to total non-general and administrative operating costs. The rate base excludes capital expenditures, the cost of collection items, equipment depreciation, and the expense allocation to SAO (home office allocation). These costs include such offices as the Secretary of the Smithsonian Institution (OS), Comptroller (OC), and General Counsel (OGC).

The Smithsonian Environmental Research Center (SERC) Core Support rate is the ratio of SERC administrative personnel and related support costs to total SERC-sponsored project direct costs.

The National Science Resources Center (NSRC) Core Support rate is the ratio of NSRC administrative personnel and related support costs to total NSRC-sponsored project direct costs.

Indirect Cost Rates
(continued)

Smithsonian Astrophysical Observatory Rates

The SAO General and Administrative rate is the ratio of total central administrative, independent research and development, proposal preparation, and support activity costs to the total cost of SAO operating activities, and net of costs associated with materials, subcontracts, and equipment. In addition, the ratio base includes Central Engineering costs and the applicable share of indirect expenses.

The SAO Direct Operating Overhead rate is the ratio of allocated facilities, personnel and operation support, and data center costs to total sponsored-project and independent research and development and proposal preparation direct labor and benefit costs.

The SAO Material Burden rate is the ratio of allocated procurement services and administration, and materials handling costs to the costs of acquisition and maintenance of subcontracts, materials, supplies, and equipment.

The SAO Leave rate is the ratio of SAO annual, sick, and administrative leave costs to the costs of SAO full-time labor costs.

The SAO Central Engineering Overhead rate is the ratio of Central Engineering administrative, management, and technical support staff costs and related expenses to Central Engineering direct labor and benefits costs.

Smithsonian-wide Rates

The Fringe Benefits rate is the ratio of full- and part-time trust employees' social security, retirement, health and life insurance, unemployment taxes, disability compensation, and leave adjustments to total salary and wage costs, minus the labor of intermittent and less-than-90-day appointment employees (for whom a separate fringe benefit rate applies).

Indirect Cost Rates
(continued)

All of these rates are applied at a fixed percentage for a fiscal year. For government-sponsored projects (Fund Code 803), any difference between the fixed-rate calculated expenses (i.e., the fixed indirect cost rate times the actual allocation base) and the actual pool expenses at fiscal year-end is carried forward as an adjustment in calculating a future year's rate. The Office of Naval Research (ONR) government contracting officer determines the carry-forward allocation across future fiscal years.

Auxiliary Activity Rate

The Smithsonian Institution uses an auxiliary activity rate to recover the administrative support costs of auxiliary activities, business contracts, and other trust funds.

The auxiliary activity rate is calculated and applied under procedures established by the Chief Financial Officer (CFO), which ensure that administrative costs are spread across the units that benefit from those services. It generally does not fluctuate from year to year.

Waiver of Indirect Cost Recovery for Government Grants

A waiver of indirect costs on a sponsored project results in a subsidy of incurred costs by unrestricted trust funds. Consequently, waivers are rarely considered. If a waiver is granted, the cost is borne by the requesting unit from discretionary or other non-sponsored project sources.

Project subsidies are more appropriately provided at the level of the Under Secretary, museum, research center, or office, through the budget process, which allows activities to be evaluated and ranked against other priorities.

Waiver of AS/PO Cost Recovery for Non-government Grants

Indirect cost recovery on non-government-sponsored projects may be waived when the Office of Development (OD) determines that the sponsor has a documented policy stating that it does not pay for or

**Waiver of AS/PO
Cost Recovery
for Non-government
Grants (continued)**

that it limits certain indirect costs. For additional information on AS/PO waiver procedures, please see the AS/PO Waiver Process and Procedure on the Office of Sponsored Projects (OSP) website.

Other requests for waivers must be reviewed on a case-by-case basis to determine their financial impact. Waivers designed to improve the net income position of a business activity or to make more funding available for direct costs of sponsored projects are not approved.

**Waiver of Indirect
or AS/PO Cost
Recovery**

Requests for waivers of indirect or AS/PO costs for units other than SAO are sent through the OSP Director to the CFO for a decision. SAO waiver requests are sent through the SAO Financial Manager to the CFO for a decision. Requests for waivers of indirect costs on auxiliary activities are sent through the Smithsonian Comptroller to the CFO.

Because of the budgetary impact of waiving indirect or AS/PO costs, the OSP, OC, and SAO will document each approved indirect cost waiver. In addition, the OSP, OC, and SAO will provide an annual report of approved waivers to the Smithsonian's CFO.

Responsibilities

The OC and Office of the Chief Information Officer apply fixed indirect cost rates to sponsored-project direct costs (Fund Codes 802 and 803).

The OC and OSP conduct analyses and reviews of rates.

The OC also develops and applies auxiliary activity rates.

SI units, OD, OSP, OC, and SAO allocate budget rates in proposals.

The OSP develops indirect cost rates and negotiates and serves as liaison with the ONR on rate approval for government grants and sponsored-project contracts.

Responsibilities
(continued)

The SAO develops indirect cost rates and presents them through OSP to ONR for approval.

The CFO is responsible for approving these rates and for signing all external rate agreements.

**Applicable Rates
and Table of Rate
Applicability**

Current rates for use in preparing project proposals to sponsors are provided at:

<http://prism.si.edu/oc/governmentindirectcostrates.htm>

Table of Rate Applicability

Is the Rate Applied to a ... (Fund Code)?	Fringe Benefits	Grants and Contracts	SI-Mail or SAO G&A	SI-Mail Core Support	SAO Direct Operating	Materials Burden	SAO Leave	Central Engineering Overhead	Auxiliary Activity Rate
Government Grants and Contracts (803)	Yes	Yes	Yes	Only SERC or NSRC	Only SAO	Only SAO	Only SAO	Only SAO	No
Non-Government Sponsored Project (802)	Yes	Yes	Yes	Only SERC or NSRC	Only SAO	Only SAO	Only SAO	Only SAO	No
Contribution (801)	Yes	No	No	No	No	No	No	No	No
All Other Trust Funds	Yes	No	No	No	No	No	No	No	No
Corporate Sponsorship	No	No	No	No	No	No	No	No	No

CANCELLATION:
INQUIRIES:
RETENTION:

SD 304, June 25, 1998
Office of Sponsored Projects
Indefinite. Subject to review for currency 24 months from date of issue

ADMINISTRATIVE CONTROL OF FUNDS

Overview	2
Section A: Federal Funds	
Purpose	2
Scope	3
Authority	3
Definitions	4
Responsibilities and Functions	7
Prohibited Actions	12
Violations of the Antideficiency Act (Statutory Violations)	13
Non-statutory Violations	13
Penalties for Statutory Violations	14
Penalties for Non-statutory Violations	15
Reporting Statutory Violations	15
Reporting Non-statutory Violations	16
Accounting Support for Fund Control Systems	17
Apportionment Procedures	18
Allotments, Suballotments, and Allocations	18
Deficiency Apportionments	20
Administrative Control of Revolving Funds	20
Reprogramming of Funds	20
Reimbursements	22
Anticipated Budgetary Resources Already Enacted into Law	23
Section B: Trust Funds	
Purpose	24
Scope	24
Authority	25
Definitions	25
Responsibilities and Functions	27
Administrative Division of Trust Funds	34
Violations of Trust Fund Control Policies	35
Penalties for Violating Trust Fund Control Policies	36
Reporting Trust Fund Control Violations	36
Accounting Support for Fund Control Systems	37

Appendix 1: Relationship Between Administrative Fund Control and Financial/Accounting Systems — Federal
Appendix 2: Federal Funds Distribution/Responsibility
Appendix 3: Trust Funds Distribution/Responsibility
Appendix 4: Relationship Between Administrative Fund Control and Financial/Accounting Systems — Trust
Appendix 5: Internal Reprogrammings
Appendix 6: Delegation of Authority

Overview

This directive establishes and prescribes the policy, procedures, and responsibilities for the administrative control of federal funds apportioned to the Smithsonian Institution, and also establishes the policies, procedures, and responsibilities for administrative control of Smithsonian Institution trust funds.

This directive is prepared in two sections — Section A establishes policy for administrative control of federal funds, and Section B establishes policy for administrative control of trust funds.

This directive applies to all federal and trust funds, except for trust funds generated by business activities operated by Smithsonian Enterprises (SE) or Smithsonian Institution units (as Fund 420). Business activities are not covered by this directive because revenue generated by business activities are not subject to the same restrictions.

SECTION A: FEDERAL FUNDS

Purpose

This section establishes policy for the administrative control of federal funds. The policies and procedures described herein are designed to:

- ensure that obligations and expenditures do not exceed the amount available in each appropriation or fund account
- ensure that obligations and expenditures do not exceed the apportionment amounts made by the Office of Management and Budget (OMB).

- Purpose** (continued)
- identify the person responsible for any obligation or expenditure exceeding the amount available in the appropriation or fund account, the OMB apportionment or reapportionment, the allotments or suballotments made by the Institution, any statutory limitations, and any other administrative subdivision of funds made by the Institution
 - provide procedures for dealing with Antideficiency Act violations, as well as violations of other administrative subdivision of funds that are not Antideficiency Act violations, *per se*
-

Scope

This section of the directive applies to all Smithsonian units, including the director of each museum, research center, office, and any other organizations receiving federal appropriations, funds, allotments, and apportionments. This directive also applies to revolving federal fund accounts (e.g., Barro Colorado Island Federal Trust Fund) that may not otherwise be subject to apportionment.

- Authority**
- Authority for the administrative control of federal funds at the Smithsonian Institution is contained in the following documents:
- Revised Statutes, §§5579–5594, derived from the Act of August 10, 1846, 9 Stat. 102–106, approved August 10, 1846, as supplemented by subsequent enactments of the U.S. Congress. *See 20 United States Code* (U.S.C.) §§ 41 et seq.
 - Provisions of Title 31, U.S.C., Money and Finance, applicable to budget formulation, approval, and execution
 - The Antideficiency Act, as amended, sections 1341–1342, 1349–1351, 1511–1513, 1514–1519
 - The Budget and Accounting Act of 1921, as amended, sections 1101, 1104–1108, and 3324
 - The Supplemental Appropriations Act of 1955,

Authority (continued)

- as amended, sections 1501–1502 (and portions of section 1311)
- Budget and Accounting Procedures Act of 1950, sections 1112, 1531, 3511–3512, and 3524
- Congressional Budget and Impoundment Control Act of 1974, section 1102 (see Title 2, U.S.C.); sections 901–903
- Title X of P.L. 93–344, found at 2 U.S.C., sections 681–688)
- Title 20, U.S.C., Education, Chapter 3, sections 42, 54, and 55
- Title 20, U.S.C., Education, Chapter 3, sections 79, 79a–79e (Barro Colorado Island Trust Fund)
- OMB Circular A-11, Part 4, *Instructions on Budget Execution*, and related OMB guidelines

Definitions

The definitions, terminology, and concepts in OMB Circular A-11 apply, as applicable to the administrative control of funds policy.

Appropriation. A provision of law (not necessarily in an appropriations act) authorizing the expenditure of funds for a given purpose.

Apportionment. A distribution by OMB of amounts available for obligation in an appropriation or fund account into amounts available for specified time periods, programs, activities, projects, objects, or any combination of these. The apportioned amount limits the obligations that may be incurred. An apportionment may be further divided by the Institution into allotments, suballotments, and allocations. At the Smithsonian, apportionments correspond to the Institution's separate fund accounts: Salaries and Expenses (S&E), one-year; S&E, no-year; S&E, two-year; Facilities Capital; and Legacy Fund.

Allotment and **Suballotment.** A formal administrative subdivision of an apportionment that represents the

Definitions
(continued)

authority delegated by the Under Secretary for Finance and Administration/Chief Financial Officer (USF&A/CFO) to incur obligations within a specified amount pursuant to an OMB apportionment or reapportionment. Incurring obligations in excess of the amount specified in the allotment or suballotment is a violation of the Antideficiency Act. At the Smithsonian, the allotment is the same as the apportionment, and there is no further division into suballotments.

Administrative Division of Funds. Any distribution of an appropriation. Overobligations or overexpenditures of the following administrative divisions of funds are always violations of the Antideficiency Act: apportionments, allotments, and suballotments.

Allocation. The further distribution of allotments and suballotments to the various budget activities, subactivities, or projects as specified in the Appropriations Committee reports (reprogramming levels) within the limitations of apportionments and reapportionments approved by OMB. An obligation made in excess of a Smithsonian allocation can lead to a statutory violation of the Antideficiency Act when an obligation causes the total of all allocations within an apportionment, reapportionment, or allotment to be exceeded. At the Smithsonian, budget allocations are issued by the Office of Planning, Management and Budget (OPMB) to the directors of each unit, and the directors of each unit are accountable for ensuring that obligations do not exceed allocations.

Agency Limitation. A limitation on the amount of funds that can be obligated or committed for a specific purpose. Limitations are most often established through appropriations acts, although they can also be established through authorizing legislation or by the Institution.

Antideficiency Act. Enacted legislation that prevents the incurring of obligations or the making of expenditures in excess of amounts available in appropriations, apportionments, reapportionments,

Definitions
(continued)

allotments, or suballotments unless specifically authorized by law. The Antideficiency Act also fixes responsibility to individual(s) for the creation of any obligations or the making of any expenditure that exceeds appropriations, apportionments, reapportionments, allotments, or suballotments.

Budget Transfer Request. The internal Smithsonian process used by units to formally request a shifting of funds within an appropriation or fund account. Realignment of funds for the same purpose as intended at the time of the original appropriation are processed as an internal redirection of funds. Shifts that result in the funds being used for a different purpose than intended in the appropriation are treated as a reprogramming action.

Expired Account. An appropriation or fund account in which time available for incurring new obligations has expired. Expired accounts retain their fiscal year identity for five years after authority to incur new obligations has ended.

Fund Account. An account established in the Smithsonian's financial system, consisting of three digits to record appropriated funds or other funds earmarked by law for specific purposes, thereby providing the framework for fund control. Smithsonian appropriations are treated as general fund accounts, since these funds are for the general support of the Institution. All monies received to carry out the Barro Colorado Island mission authorized by Title 20, Chapter 3, Subchapter IX, section 79, are treated as a special fund account.

Interagency Agreement (IAA). An agreement between the Smithsonian and a federal agency to transfer federally appropriated funds to the Institution. Interagency transfer (IAT) funds are recorded in the Smithsonian financial system as federal allocations, as follows:

- Fund 007 – 1 year
- Fund 127 – 2 year
- Fund 119 – No-year

Definitions
(continued)

These funds are subject to the same controls as if they had been directly appropriated.

Internal Controls Internal controls are the processes designed to provide reasonable assurance of the Smithsonian's ability to achieve and sustain effective and efficient operations, reliable financial reporting, and compliance with applicable laws, regulations and policies.

Reapportionment. A revision approved by OMB of a previous apportionment for an appropriation or fund account. The revision, unless otherwise stated, would cover the same period, activities, projects, or objects covered in the original apportionment.

Reprogramming. A shifting of funds within an appropriation or fund account that will result in the fund being used for different purposes than those intended at the time of the original appropriation. A reprogramming is generally preceded by consultation between the Smithsonian and the appropriate congressional appropriation committees, and often involves formal notification and opportunity for congressional committees to state their approval or disapproval. At the Smithsonian, the reprogramming base for Salaries and Expenses (S&E) is established as the budget line items presented in the "Summary of the S&E Appropriation and Budget Estimates" table included in the congressional budget submission. For Facilities Capital, the reprogramming base is as reported in the Conference level column in the table of the final fiscal year Appropriation Act. A reprogramming is also defined as a budget change which represents any significant departure from the program described in the Institution's budget justification.

Transfer Authority. A shifting of all or part of the budget authority in one appropriation or fund account to another, as specifically authorized by law. The Smithsonian Institution does not have this authority.

**Responsibilities
and Functions**

The assignment of responsibility for administrative control of funds at the Smithsonian ensures that federal

**Responsibilities
and Functions**
(continued)

funds are used in accordance with pertinent authorizations and appropriations acts, and other relevant statutory provisions. This section identifies those individuals and positions responsible for fund control, and their responsibilities with regard to investigating, reporting, and following up on Antideficiency Act violations, and violations of agency limitations that are not otherwise considered Antideficiency Act violations.

The Secretary is responsible for proper fund control and for reporting violations of such controls to the President and the Congress as required by 31 U.S.C 1351 and 1517(b). The fund control responsibility may be delegated in writing to a senior manager who will ensure adherence to the law and maintain the systems established for administrative control of funds.

The USF&A/CFO is delegated the responsibility, by the Secretary, for administrative (fund) control of federal appropriations and funds, and for reporting any violations of such controls. The USF&A/CFO is responsible for:

- developing and maintaining an integrated budgeting, accounting, and financial management system, including financial reporting and financial management internal controls for the Institution
- developing and implementing operating and reporting procedures to provide safeguards against incurring obligations or making expenditures in excess of available appropriations, apportionments, reappportionments, allotments, or suballotments
- submitting apportionment or reappportionment requests to OMB
- issuing annual allotments to the Director, OPMB, within approved apportionments or reappportionments
- identifying the person(s) responsible for any obligation or expenditure in excess of the amount

**Responsibilities
and Functions**
(continued)

available in the appropriation, apportionment, reappropriation, allotment, or suballotment; in excess of statutory limitation amounts; or in excess of amounts in any other administrative subdivision of funds made by the Institution

- investigating Antideficiency Act violations, and for reporting such violations to the Secretary. The responsibility for conducting the investigation may be delegated, in writing, to another senior official within the USF&A/CFO's organization.

The Director, Office of Planning, Management and Budget (OPMB), is responsible for:

- preparing, and forwarding to the USF&A/CFO for approval, apportionment and reappropriation requests to OMB
- following apportionment or reappropriations by OMB, requesting the USF&A/CFO to establish allotments or suballotments, in accordance with appropriations
- issuing budget allocations to Smithsonian organizational units that do not exceed the total amount of each allotment or suballotment
- ensuring the allocations are consistent with the Institution's budget request to Congress, as limited by congressional language, as amended by the apportionment or reappropriation process, and as modified by approved reprogramming actions
- accepting fund control responsibility for federal allotments and suballotments, when such responsibility is delegated by the USF&A/CFO
- reviewing the Smithsonian organizational units' execution of allocated funds to ensure compliance with the Institution's fund control system
- working with the Smithsonian Comptroller to identify higher-than-expected rates of obligations and

**Responsibilities
and Functions**
(continued)

expenditures, and to take corrective action so that deficiencies and violations can be avoided

- identifying possible Antideficiency Act violations to the USF&A/CFO for reporting to the Secretary, the President, and the Congress
- recommending actions to be taken to correct the violations and implementing corrective actions approved by the USF&A/CFO
- approving budget transfer requests for internal redirections of appropriated funds
- preparing, and submitting to the Office of Government Relations, reprogramming requests that require congressional approval prior to implementation
- ensuring compliance with congressional reprogramming thresholds
- ensuring that obligations and expenditures are made only for authorized purposes and that they do not exceed amounts provided
- establishing budgetary rules in the Smithsonian financial system to implement the Institution's administrative control of funds responsibilities

The Comptroller is delegated the responsibility by the USF&A/CFO for conducting all investigations related to actual or potential violations of the Antideficiency Act. The Comptroller is also responsible for:

- establishing and maintaining accounts and records necessary to administer apportionments, reapportionments, and fund accounts as part of the Institution's accounting system
- reporting on the status of federal appropriations, apportionments, allotments, allocations, and unpaid obligations, and for complying with external reporting requirements

**Responsibilities
and Functions**
(continued)

- maintaining timely and accurate entry of obligating documents and/or expenditure documents into the financial system
- verifying the reliability of the data in these reports
- coordinating with the Chief Information Officer (CIO), and maintaining the proper Enterprise Resource Planning (ERP) system controls to ensure that the ERP system will not allow an overobligation or overexpenditure of funds that is not identified by the ERP system and resolved prior to an actual overobligation or overexpenditure
- if delegated by the USF&A/CFO, conducting all Antideficiency Act violation investigations, and for coordinating these activities with OPMB
- coordinating with OPMB and the respective unit or organization to ensure that no entries of an allocation, obligation, or expenditure, or other accounting transaction will be recorded that causes fund control authorities to be exceeded

Directors of Museums, Research Centers, and Offices, who receive allocations from the Director, OPMB, are responsible for:

- delegating responsibility for funds controls in their organization to appropriate officials. This responsibility shall be clearly defined, and the affected individuals shall be appropriately notified in writing of the extent of their responsibility. An example of Delegation of Authority is in Appendix 6
- ensuring that these designated officials are charged with individual responsibility for any overobligation or overexpenditure in excess of allocations
- ensuring that obligations/expenditures are for the purposes intended in the appropriation bill and that obligations/expenditures satisfy the bona fide need statute

**Responsibilities
and Functions**
(continued)

- ensuring that obligations and expenditures do not exceed the formal subdivision of funds from OPMB as federal allocations
- determining that amounts distributed to subdepartments within their organization do not exceed the unit's federal allocation
- adhering to all restrictions and limitations on funds provided in their allocation memorandum
- reporting potential or suspected Antideficiency Act or other fund control violations to the Director, OPMB, and the Comptroller within 10 days after such violation is identified
- developing detailed object class financial plans, as requested by the Director, OPMB
- creating, at their discretion, in the Smithsonian's financial system, detailed budgets at the subdepartmental level to manage fund control and/or execution at organizational levels below that controlled by OPMB. These subdepartmental budgets are not subject to administrative control of funds policies addressed in this directive
- preparing budget transfer requests to realign funds between Smithsonian units or other funds subdivisions, such as designated codes, and submitting such requests to the Director, OPMB, for approval

The Director, Office of Government Relations (OGR), is responsible for tracking the status of all reprogramming requests submitted to Congress.

Prohibited Actions

There are two general types of violations: violations of the Antideficiency Act and violations of limitations that do not *per se* violate the Antideficiency Act. These types of prohibited actions are described below.

**Violations of the
Antideficiency Act
(Statutory Violations)**

The following actions or occurrences are prohibited by sections 1341, 1342, and 1517(a) of 31 U.S.C.:

- Making or authorizing an expenditure or creating or authorizing an obligation against any federal funds in excess of the amount available in the account or in excess of a congressionally imposed limitation contained in an authorization or appropriation act restricting the amount for a particular program or activity. This includes adjustments that cause obligations in expired accounts to exceed the apportionment for the year in which such obligations were incurred
- Involving the Smithsonian in any contract or other obligation for the payment of federal funds for any purpose in advance of an appropriation made for such purpose, unless such contract or obligation is authorized by law
- Accepting voluntary service for the United States or employing personal services in excess of that authorized by law, except in cases of emergency involving the safety of human life or the protection of property, and except for gratuitous services authorized by Title 20 U.S.C. 41 to enable the Smithsonian to perform its official mission
- Exceeding current year funds as a result of charging obligations/expenditures associated with a canceled appropriation to the current year funds, if the obligation/expenditure or cumulative obligations exceed the current year appropriation by 1 percent or more. (An appropriation is canceled at the end of the fifth year after obligational authority has expired. When canceled, funds are no longer available for valid obligations/expenditures, and such obligations/expenditures must be charged against the current fiscal year's appropriation)

**Non-statutory
Violations**

Violations of Smithsonian administrative subdivisions of funds (internal resource distributions) are not violations of the Antideficiency Act except when the violation causes overobligation or overexpenditure of the

**Non-statutory
Violations (continued)**

allotment, apportionment, reapportionment, or appropriation. The following actions or occurrences are treated as non-statutory violations:

- Making or authorizing an expenditure or creating or authorizing an obligation against any federal funds in excess of the amount allocated to the Smithsonian museum, research center, or office that does not lead to a statutory violation
- Expending or obligating federal funds for a purpose other than that provided for in the formal budget allocation letter
- Failing to adhere to all restrictions and limitations imposed in the formal budget allocation letter
- Failing to comply with Smithsonian funding guidelines related to the purpose and use of funds

**Penalties for
Statutory Violations**

An officer or employee of the Smithsonian who violates the Antideficiency Act will be subject to appropriate administrative discipline. The law provides that any officer or employee of the United States who violates the prohibitions of 31 U.S.C. 1341(a), 1342, or 1517(a) will be subject to, based on the severity of the violation, the following forms of administrative discipline:

- Letter of reprimand or censure for the official personnel record of the officer or employee
- Unsatisfactory performance rating
- Transfer to another position
- Suspension from duty without pay
- Removal from office

In addition, the law provides that any officer or employee of the United States who knowingly and willfully violates these prohibitions shall be fined not

**Penalties for
Statutory Violations
(continued)**

more than \$5,000, imprisoned for not more than two years, or both.

**Penalties for Non-
statutory Violations**

A Smithsonian officer/employee who violates non-statutory administrative subdivisions of funds will be subject to the same penalties listed above for statutory violations, except that any officer/employee who knowingly and willfully violates the non-statutory prohibitions will not be fined or imprisoned.

**Reporting Statutory
Violations**

Antideficiency Act violations must be reported to the President and the Congress, through OMB, in the form of a letter, signed by the Smithsonian Secretary, as required by OMB Circular A-11. All violations (both statutory and non-statutory) must be reported to the USF&A/CFO immediately upon discovery. Any individual with knowledge of a possible violation has the responsibility to report it. Action taken to correct the cause of the violation does not eliminate the violation; it must still be reported. Use of the Smithsonian Inspector General's hotline at OIGHotline@oig.si.edu or <http://prism.si.edu/oig/form.htm> is acceptable if the individual with the knowledge wants to remain anonymous.

The USF&A/CFO is responsible for collecting and investigating the facts associated with the violation, and for preparing the required report for the Secretary. Officers and employees of Smithsonian museums, research centers, and offices with responsibility for the violation are required to support the USF&A/CFO in this effort and to participate fully in the fact-finding and investigative activities. The violation report include the following:

- All pertinent facts of the violation, including
 - title and Treasury symbol of the appropriation or fund account
 - amount involved
 - date on which the violation occurred
 - primary reason or cause

**Reporting Statutory
Violations** (continued)

- statement by the responsible officer or employee of any circumstances believed to be extenuating
- The names and positions of the officers or employees responsible for the violation
- A statement of administrative discipline proposed and any other actions to be taken, or any explanation as to why no disciplinary action is considered necessary
- A recommendation for any safeguards considered necessary to prevent a recurrence of the same type of violation
- In the case where an officer or employee is suspected of willfully and knowingly violating the Antideficiency Act, the report must also indicate whether the appropriate information has been submitted to the Department of Justice for determination of whether further action is necessary.
- A statement regarding the adequacy of the system of the Smithsonian's administrative control system and approved by OMB. (If changes in the directive are needed, in the judgment of the director of any Smithsonian museum, research center, or office, then proposals for such changes will be submitted to the Director, OPMB.)

**Reporting Non-
statutory Violations**

Violations of the Smithsonian's approved resource distribution plan (budgetary allocations) will be reported by the director of the responsible museum, research center, or office to the USF&A/CFO, setting forth the same information as required for a statutory violation, except that the federal budget allocation involved will be cited in addition to the appropriation symbol and title. The report shall be furnished to the USF&A/CFO, with a copy provided to their Under Secretary or Director, within 30 days of the date in which the violation was discovered.

**Accounting Support
for Fund Control
Systems**

The Smithsonian accounting system provides full accounting to support the provisions of this administrative fund control policy. The system provides complete, accurate, and timely budgetary and financial data for each account, including (1) total budgetary resources available for obligation against each control level (apportionment, allotment, allocation) and activity or project levels specified in Appropriations Committee reports, or other internal limitations; and (2) total valid obligations incurred to date against each control level.

The reports available from the accounting system serve a variety of needs, providing both detailed and summary information for funding, costs (commitments, obligations, and expenditures), billings, and collections. The data contained in these reports also support financial reporting to external entities such as the Department of Treasury and OMB.

The safeguards provided in the accounting system do not relieve the USF&A/CFO, the Comptroller, the Director, OPMB, or the allocation or allotment holder of responsibility for ensuring that obligations incurred and expenditures made do not exceed the amount of an allocation or allotment.

The Smithsonian financial and accounting system, PeopleSoft Financials, provides for a hierarchical budgetary structure that fully integrates the Institution's administrative fund control system.

Appendix 1 describes, in detail, the relationship between Smithsonian fund control and financial/accounting systems, and provides a crosswalk between the funds control system and financial system structure.

SD 305, *Administrative Control of Funds*, is supported by [SD 310](#), *Financial Reporting and Risk Management Internal Controls*. SD 310 requires unit directors to complete an annual Assurance Statement, certifying that the unit's internal controls are operating effectively and that the unit's financial information presented to the USF&A/CFO fairly represents the unit's financial condition.

**Apportionment
Procedures**

Apportionment of funds is required for appropriated funds, estimated carryover amounts (from no-year and multi-year appropriations), and interagency reimbursements.

An apportionment is a distribution made by OMB of amounts available for obligation in an appropriation, into amounts available for specified time periods, programs, or activities. The apportioned amount limits the obligations that may be incurred. A reapportionment is a revision approved by OMB of a previous apportionment.

Apportionment requests are prepared by the Director, OPMB, and are approved by the USF&A/CFO following receipt of an appropriation, supplemental appropriation, or rescission of federal funds.

When the apportionment is approved by OMB, the USF&A/CFO allots the funds to the Director, OPMB, and the Director, OPMB, issues allocations to the Smithsonian museums, research centers, and offices.

**Allotments,
Suballotments,
and Allocations**

Function and Purpose. Allotments and suballotments are used to distribute apportioned funds to officers and employees of the Smithsonian who are authorized to incur obligations. Allotments are issued by the Smithsonian USF&A/CFO for the purpose of incurring commitments, obligations, and expenditures against the specified appropriation for which the allotment is made. Allotments are not to be made in excess of the amounts and limitations of apportionments or reapportionments. No obligation shall be authorized or created, nor expenditures made, unless an allotment has been established in accordance with this directive. Allotments are further subdivided and distributed to Smithsonian organizations in the form of budget allocations.

Restrictions. The following restrictions apply:

- The sum of allotment amounts issued will not exceed the apportionment

**Allotments,
Suballotments,
and Allocations**
(continued)

- The sum of suballotment amounts issued will not exceed the allotment amount
- The sum of budget allocations will not exceed the allotted amount
- The amounts of allotments or other administrative subdivision of funds will be fixed and will be changed only when authorized by the authority who initially issued the subdivision
- Congressional restrictions contained in appropriation acts will be enforced

Procedures. Allotment and internal reporting systems shall be designed so that responsibility for budget control is placed at the highest practical organizational level consistent with effective and efficient management. The Smithsonian has designated this to be the appropriation account level specified in the Appropriations Committee reports.

- The distribution of allotments is made in writing by the USF&A/CFO to the Director, OPMB, in accordance with the funding levels established by the OMB apportionment or reapportionment.
- OPMB inputs the apportionment and allotments into the financial system providing obligation and spending controls to Smithsonian museums, research centers, and offices by issuing budget allocations. Authorizations and obligations cannot be entered in the financial system until allocations are approved.
- Smithsonian museums, research centers, and offices are notified by OPMB that they have received allocations, and that these amounts are available for obligation and expenditure.

A table describing the distribution of and responsibility for federal funds is provided in Appendix 2.

**Deficiency
Apportionments**

Apportionments that anticipate the need for a deficiency appropriation or supplemental under 31 U.S.C. 1515 will be specifically identified in the apportionment request.

To qualify as a deficiency apportionment, the request must be required by laws enacted subsequent to the transmittal of the annual budget for the year to Congress; emergencies involving human life, the protection of property, or immediate welfare of individuals; and specific authorization by law.

**Administrative
Control of Revolving
Funds**

Obligations and expenditures of the Smithsonian's Barro Colorado Island federal trust (revolving) fund, while exempt from apportionment procedures, may not be made in excess of available budgetary resources.

The incurring of obligations and the making of expenditures in excess of available budgetary resources is a potential violation of the Antideficiency Act. Budgetary resources are those monies received by the Smithsonian by donation, subscription, fees, or otherwise to carry out the purposes of 20 U.S.C., sections 79a and 79b.

Systems for the administrative control of trust (revolving) funds should be placed at the organizational level at which the budgetary resources may be received, held, transferred, obligated, or expended. At the Smithsonian, this level is the Smithsonian Tropical Research Institute (STRI) in Panama.

Accounting records are maintained in the Smithsonian financial and accounting system to provide full disclosure of STRI's financial operations and resource utilization of Barro Colorado Island trust funds. These fund control records constitute an integral part of the Institution's official accounting records.

**Reprogramming
of Funds**

The Institution's administrative control of funds system enables the USF&A/CFO, the Comptroller, and the Director, OPMB, to track obligations and expenditures at the activity and project levels specified in the

**Reprogramming
of Funds** (continued)

Appropriations Committee's reports (reprogramming baseline levels). Although reprogrammings are not subject to provisions of the Antideficiency Act, and, therefore, are not subject to statutory control, they are subject to the Appropriations Committee's reprogramming rules as implemented within the Institution.

Reprogramming Baselines:

- The activity and project levels specified in the detailed tables of the Appropriations Committee's reports establish the Institution's reprogramming baselines.
- In the congressional budget request, Salaries and Expenses (S&E) activities and projects are presented in the table, "Summary of the Current Year Appropriation and the Budget Year Estimates." The Institution's S&E budget activities are: Museums and Research Centers; Program Support and Outreach; Administration; Office of the Chief Information Officer; Inspector General; and Facilities Services. The line items that fall under each budget activity are the budget projects.
- For Facilities Capital, the reprogramming base is as reported in the Conference level column in the table of the final fiscal year Appropriation Act. Recently, the Institution's Facilities Capital budget line items have been: Revitalization, Construction, and Facilities Planning and Design.

Reprogramming Guidelines:

- The annual threshold for reprogramming, and that which requires prior congressional approval, is standardized for all Institution projects and activities as the lesser of \$1,000,000 or 10 percent. A reprogramming shall also consist of any significant departure from the program described in the Institution's budget justifications at the budget project level.

**Reprogramming
of Funds** (continued)

- A reprogramming should be requested when an unforeseen situation arises that requires funds be applied for a different purpose than that intended at the time of the original appropriation request. The Smithsonian's Appropriations committees also treat functional transfers and reorganizations as activities requiring reprogramming approval.
- A reprogramming shall not be used to initiate new programs or change allocations specifically denied, limited, or increased by the Congress in an Act or report.
- Congressional committee reprogramming guidelines state that reprogramming proposals submitted to the House and Senate Committees on Appropriations for approval shall be considered approved 30 calendar days after receipt if the Committees have posed no objection. However, the Institution will be expected to extend the approval deadline if specifically requested by either Committee
- Initiating work on a project, which uses funding that depends on approval of a reprogramming action, prior to congressional approval of a reprogramming request is a violation of the Institution's administrative control of funds policy.
- The internal procedures for identifying and evaluating the need for reprogramming are indicated in Appendix 5.

Reimbursements

The Smithsonian may be authorized to accept reimbursable orders for services or supplies provided to other federal agencies when amounts are available, when use of an interagency agreement is in the best interest of the Government, and when the Smithsonian is able to provide or procure the ordered goods or services. All reimbursable work is preceded by a fully executed interagency agreement. Administrative controls must ensure that obligations and expenditures do not exceed overall apportionments, allotments, or budgetary resources readily available for obligation.

**Anticipated
Budgetary
Resources Already
Enacted into Law**

Apportionments may include estimated amounts of “anticipated” budgetary resources that are the result of laws already enacted. This is done to reduce routine reapportionments of such amounts as they actually become available. Anticipated amounts will not be allotted by the USF&A/CFO, or allocations issued by OPMB to Smithsonian units, until the increase actually occurs.

SECTION B: TRUST FUNDS

Purpose

This section establishes policy for the administrative control of Smithsonian trust funds. The policies and procedures described herein are designed to:

- ensure that obligations and expenditures do not exceed the amount available in each unrestricted and restricted trust fund account
- identify the person responsible for any obligation or expenditure that exceeds the amount available in the trust fund account or for violating the intended purpose of trust funds
- provide procedures for dealing with noncompliance and/or violation of administrative control policies for Smithsonian trust funds

Scope

This section of the directive applies to all Smithsonian units, including the director of each museum, research center, and office, and any other organizations that obligate and expend unrestricted and/or restricted trust funds, which are defined as follows:

- Unrestricted funds are central trust funds (Fund 401) and unit discretionary funds (Fund 402)
- Smithsonian Campaign (Fund 411)
- Restricted trust funds are endowment payouts (Fund 6xx), gifts (Funds 800 and 801), Non-Government Grants and Contracts (Fund 802), Government Grants and Contracts (Fund 803), and SI Trust Capital (Fund 805)

The trust fund control policy applies to all trust funds distributed to the director of a Smithsonian unit in the form of an allocation, an advance, an award, payout, revenue, or transfer, with one exception. Trust funds generated by business activities operated by Smithsonian Enterprises and other Smithsonian unit

Scope (continued)	business activities, financed through Fund 420, are not covered by the regulations or provisions of this policy.
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Authority	<p>Authority for the administrative control of Smithsonian trust funds is contained in the following documents:</p> <ul style="list-style-type: none">• Title 20, U.S.C., Education, Chapter 3, section 41 et seq.• Bylaws of the Smithsonian Board of Regents, sections 4.01 (Audit and Review Committee), 4.02 (Finance and Investment Committee), 5.05 (Chief Financial Officer), 6.02 (Endowment Fund; Other Nonappropriated Funds), 6.04 (Budget), and 6.05 (Audit)
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Definitions	<p>The following definitions, terminology, and concepts apply to the administrative control of funds policy.</p>
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Administrative Division of Funds. Any distribution of an original trust funding source, as follows:

- **Allocation.** The distribution of unrestricted central trust funds (Fund 401) from OPMB to the director of a Smithsonian museum, research center, or office
- **Advance.** The distribution of approved internal advances to the director of a Smithsonian museum, research center, or office. Advances are generally provided in Fund 801, but can be provided in any fund. Advances are further defined in SD 308, Advances and Investments in Trust-funded Programs, which is available on Prism
- **Award.** The distribution of Government grant/contract sponsor awards (Fund 803) and non-Government grant/contract sponsor awards (Fund 802) to the director of a Smithsonian museum, research center, or office
- **Payout.** The distribution of endowment payouts to the director of a Smithsonian museum, research

Definitions
(continued)

center, or office (Fund 6xx), which represents the investment income earned on the endowment

- **Revenue.** The distribution of revenue collected from donors in the form of gifts or contributions (Funds 402, 800, and 801) to the director of a Smithsonian museum, research center, or office. Also includes the distribution of revenue raised by the Smithsonian unit, including revenue from goods sold, services provided, royalties, honoraria, investments, and settlements (Fund 402)
- **Transfer.** The reassignment of revenue or payout from one unit to another unit, including the distribution of Smithsonian Enterprises (SE) revenue-sharing earnings

Budget Transfer Request. The internal Smithsonian process used by units to formally request a shifting of Fund 401 budget funds to another unit or between designated codes.

Donor. An individual or organization that contributes (or pledges) to the Institution, museum, research center, or office a gift or real personal property such as cash, real estate, cash-convertible assets (e.g., marketable securities or life insurance), and non-cash donations (e.g., materials, equipment, and services).

Internal Controls are the processes designed to provide reasonable assurance of the Smithsonian's ability to achieve and sustain effective and efficient operations, reliable financial reporting, and compliance with applicable laws, regulations and policies.

Restricted Trust Funds. Funds that are restricted by donors or sponsors to one or more specific uses. This includes internal advance funds and transfers when the purpose of these funds is specified (or designated) by the Smithsonian unit providing these monies.

Sponsor. A non-profit or for-profit organization or federal, state, or local government entity that has

Definitions
(continued)

entered into a legally binding agreement (such as a sponsorship, grant or contract) with the Institution, museum, research center, or office to provide financial support for a specific program, project, or activity.

Unrestricted Trust Funds. Funds that are available to be spent on any Smithsonian program or activity: administrative, research, educational, and other public impact programs and activities. All trust fund expenditures should comply with the Institution's policies and practices with respect to spending of trust funds for representational, special event, entertainment, and other related purposes.

**Responsibilities
and Functions**

The assignment of responsibility for administrative control of funds at the Smithsonian ensures that obligations and expenditures of trust funds are within available budgetary resources and that trust funds are used in accordance with their intended or restricted purpose. This section identifies those individuals in positions responsible for fund control and their responsibilities with regard to ensuring that funds are used only for the purpose intended and within the limits of the Institution's fund control system.

The Board of Regents oversees the Institution's operations and ensures that the Institution's accounting systems and internal financial controls are in good order. The Board of Regents also approves the federal budget request before it is submitted to OMB and the Congress, authorizes the Secretary to expend federal and trust funds in accordance with the Institution's annual Integrated Budget Plan that the members also approve.

The Secretary has overall responsibility for proper fund control, for ensuring adherence to such controls, and for advising the Board of Regents of fund control noncompliance. Fund control administrative responsibility may be delegated to a senior manager who will ensure adherence to the systems established for administrative control of funds.

**Responsibilities
and Functions**
(continued)

***The Under Secretary for Finance and
Administration/ Chief Financial Officer***

(USF&A/CFO) is delegated the responsibility, by the Secretary, for administrative control (i.e., fund control) of unrestricted and restricted trust funds. The USF&A/CFO is responsible for:

- developing, maintaining, and documenting an integrated budgeting, accounting, and financial management system, which includes financial reporting and financial management internal controls for the Institution
- developing, implementing, and documenting operating and reporting procedures to provide safeguards against incurring obligations or making expenditures in excess of available trust budgetary resources
- identifying the person responsible for any obligations or expenditures in excess of the available trust budgetary resources

***The Director, Office of Planning, Management, and
Budget (OPMB)***, is responsible for:

- issuing central trust (Fund 401) and Smithsonian Campaign (Fund 411) budget allocations to Smithsonian organizational units that do not exceed the total amount of anticipated central trust revenue
- reviewing the Smithsonian organizational units' execution of trust funds to ensure compliance with the Institution's fund control system
- working with the Smithsonian Comptroller to identify higher-than-expected rates of obligations and expenditures, and to take corrective action to prevent fund control violations from occurring
- recommending actions to be taken to correct instances of fund control system noncompliance, and for implementing corrective actions approved by the USF&A/CFO

**Responsibilities
and Functions**
(continued)

- establishing procedural guidelines governing the expenditure of federal and trust funds
- reviewing and approving budget transfer requests for Fund 401 and 411 funding realignments
- establishing budgetary policies in the Smithsonian financial system to implement the Institution's administrative control of funds responsibilities

The Comptroller is responsible for:

- establishing, maintaining, and documenting accounts and records necessary to administer trust revenues and expenses as part of the Institution's accounting system
- entering unit-raised revenue (Fund 402) and special event fund expenses (Fund 404) into the Smithsonian's financial system
- posting gift/contribution revenue (Funds 800, 801 and 805) distributions into the Smithsonian's financial system
- posting internal advance budgets and inter-unit transfers in the financial system (any Fund)
- posting interagency transfer funds 007, 119, and 127
- facilitating the timely and accurate entry of obligating and expenditure transactions into the financial system
- verifying the reliability of data in reports generated from the accounting system. This is accomplished by adhering to the **Internal Controls** that provide reasonable assurance of the Smithsonian's ability to achieve and sustain effective and efficient operations, reliable financial reporting, and compliance with applicable laws, regulations and policies. (See [SD 310](#), *Financial Reporting and Risk*

**Responsibilities
and Functions**
(continued)

Management Internal Controls, for more information.)

- coordinating with the CIO, and maintaining the proper ERP system controls to ensure that the ERP system will not allow an overobligation or overexpenditure of funds that is not identified by the ERP system and resolved prior to an actual overobligation or overexpenditure
- ensuring that obligations and expenditures do not exceed amounts provided and are made only for authorized purposes
- coordinating with OPMB and the respective unit or organization to ensure that no entries of an allocation, obligation, or expenditure, or other accounting transaction will be recorded that causes fund control authorities to be exceeded

The Smithsonian Treasurer is responsible for the management and administration of the Institution's endowment funds (Fund 6xx) and internal advances, as follows:

- Determining annual endowment payout distributions available to each Smithsonian museum, research center, or office
- Entering annual endowment payout distributions in the Smithsonian financial and accounting system in a timely manner, but no later than the end of the first quarter of the fiscal year
- Establishing and maintaining endowment payout accounts and records necessary to administer trust revenue and transfers as part of the Institution's accounting system
- Administering the Institution's internal advances by processing and obtaining approval for each advance in accordance with [SD 308](#), *Advances and Investments in Trust-Funded Programs*

**Responsibilities
and Functions**
(continued)

- Establishing procedures for reviewing accounting data to provide adequate warning to the USF&A/CFO, the Director, OPMB, and Smithsonian unit heads that an overobligation or overexpenditure of funds is possible if timely corrective action is not taken

The Director, Office of Advancement (OA), is responsible for the proper recording of private gifts and grants received by the Institution in the advancement information system (AIS), as follows:

- Verifying that the allocation of funds is consistent with the donor's intent
- Tracking pledges and reporting to OC
- Reconciling the AIS with ERP as necessary
- Managing gift and sponsor agreements

The Director, Office of Sponsored Projects (OSP), is delegated authority by the Secretary of the Smithsonian Institution and the Director, OA, to receive and execute incoming contracts and grants for SI organizations other than the Smithsonian Astrophysical Observatory (SAO). The authority to the Director, OSP, to make sub-awards pursuant to externally funded contracts and grants received is delegated by the Director, Office of Contracting and Personal Property Management (OCon&PPM). To exercise the authority delegated by the Secretary and Director, OCon&PPM, the Director, OSP, is responsible for:

- negotiating, accepting or establishing, managing and administering externally funded Government and non-Government contracts and grants in accordance with [SD 318](#)
- distributing contracts and grants awards in the Smithsonian financial system
- posting internal advance budgets and inter-unit transfers in the financial system (Funds 802 and 803)

**Responsibilities
and Functions**
(continued)

- administering interagency transfer funds 007, 119, and 127, as described in [SD 319](#).
- monitoring the accounts and records necessary to administer Government and non-Government contracts and grants, and the revenues and expenses associated with awards
- issuing sponsor-required financial reports and invoices
- establishing procedures for reviewing accounting data to provide adequate warning to the USF&A/CFO, the Director, OPMB, and Smithsonian unit directors that an overobligation or overexpenditure of funds is possible if timely corrective action is not taken
- further delegating the authority and responsibilities for negotiating, accepting or establishing, managing and administering incoming contracts and grants and subsequent awards, only in accordance with the delegations of authority letters from the Secretary and Director, OCon&PPM

The Director, Smithsonian Astrophysical Observatory (SAO), is delegated the authority by the Secretary of the Smithsonian Institution to receive and execute externally funded Government and non-Government contracts and grants for SAO only. This authority may be delegated by the Director, SAO, to the Manager, Sponsored Programs and Procurement Department (SPP). The authority to the Manager, SPP, SAO, to expend funds and/or award contracts and subgrants pursuant to incoming externally funded contracts and grants is delegated by the Director, OCon&PPM. To exercise the authority received from the Secretary and Director, OCon&PPM, the Manager, SPP, SAO, is responsible for:

- negotiating, accepting or establishing, managing and administering externally funded contracts and grants that support the mission and programs of SAO

**Responsibilities
and Functions**
(continued)

- distributing contracts and grants awards in the Smithsonian financial system*
- posting internal advance budgets and inter-unit transfers in the financial system (Funds 802 and 803)*
- monitoring the accounts and records necessary to financially administer Government and non-Government contracts and grants, and the revenues and expenses associated with awards*
- issuing sponsor-required financial reports and invoices*
- establishing procedures for reviewing accounting data to provide adequate warning to the USF&A/CFO and the Director, OPMB, that an overobligation or overexpenditure of funds is possible if timely corrective action is not taken*
- further delegating the authority and responsibilities for negotiating, accepting or establishing, managing and administering incoming contracts and grants and subsequent awards in accordance with the delegations of authority letters from the Secretary and Director, OCon&PPM

Directors of Smithsonian museums, research centers, or offices are responsible for:

- delegating responsibility for trust fund control in their organization to appropriate officials. This responsibility shall be clearly defined, and the individuals shall be appropriately notified in writing of the extent of their responsibility
- ensuring that designated officials are charged with individual responsibility for any overobligation or overexpenditure in excess of allocations

* **Note:** These financial responsibilities at SAO are performed by the Financial Management Department (FMD).

**Responsibilities
and Functions**
(continued)

- ensuring that obligations/expenditures are for the purposes specified by donors, sponsors, and other Smithsonian units for restricted trust funds, and that unrestricted trust obligations/expenditures comply with Smithsonian funding guidelines related to the purpose and use of funds
- ensuring that obligations and expenditures do not exceed available allocations, advances, awards, payouts, revenues, and/or transfers

Principal Investigators on grants and contracts are responsible for ensuring that obligations and expenditures do not exceed the award amount in grants and contracts (Funds 802 and 803) for which they are the designated principal investigator.

**Administrative
Division of Trust
Funds**

The trust funds available to each Smithsonian unit in the financial system represent an administrative division of funds. At the Smithsonian, the available trust budget entered at the Fund Master level in the financial system represents that unit's distribution of available trust budgetary authority. The terminology used to describe divisions of trust funds differs between fund types, based on the financial nature of the fund source, as follows:

- Fund 401 (Central Trust) — allocation
- Fund 402 (Unit Discretionary) — revenue, transfer, or advance
- Fund 411 (Smithsonian Campaign) — revenue, transfer, or advance
- Fund 6xx (Endowments) — payout, transfer, or advance
- Fund 800 (Construction Gifts) — revenue, transfer, or advance
- Fund 801 (Gifts) — revenue, transfer, or advance

**Administrative
Division of Trust
Funds** (continued)

- Fund 802 (Non-Government Grants and Contracts) — award or advance
- Fund 803 (Government Grants and Contracts) — award or advance
- Fund 805 — SI Trust Capital Fund

Trust allocations, advances, awards, payouts, revenues, and transfers are provided for a specific purpose by the Secretary, the endower, the sponsor, the donor, or another Smithsonian unit. Compliance with the intended purpose and restrictions associated with trust funds is mandatory.

Appendix 3 summarizes the administrative division of trust funds structure used by the Institution.

**Violations of Trust
Fund Control
Policies**

Failure to comply with the Institution's trust fund control policies is considered an administrative violation which is subject to appropriate disciplinary action. However, failure to comply with trust fund control policies for Government grants and contracts (Fund 803) that results in violations of the OMB Circulars listed below in the last bullet could also lead to a statutory violation of the Antideficiency Act or a non-statutory violation associated with another federal agency's allotment, apportionment, or appropriation.

The following actions or incidences can result in disciplinary action:

- Making or authorizing an expenditure or creating or authorizing an obligation against any trust fund division in excess of the amounts available to the Smithsonian museum, research center, or office
- Expending or obligating funds for a purpose other than that provided for in the formal budget allocation letter (Fund 401), or as specified by the endowment (Fund 6xx), the donor (Funds 800, 801, and 805),

**Violations of Trust
Fund Control
Policies** (continued)

the sponsor (Funds 802 and 803), the Treasurer (for advances), or another Smithsonian unit (for inter-unit transfers)

- Failing to adhere to all restrictions and limitations imposed by the endowment, the donor, the sponsor, the Treasurer (for advances), or another Smithsonian unit (for transfers)
 - Failing to comply with provisions of OMB Circular A-110 (Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations), A-122 (Cost Principles for Non-Profit Organizations), and A-133 (Audits of States, Local Governments, and Non-Profit Organizations) for Fund 802 and 803 trust awards
-

**Penalties
for Violating Trust
Fund Control
Policies**

An officer or employee of the Smithsonian who fails to comply with the Institution's policies and systems for the use and control of trust funds will be subject to, based on the severity of the violation, the following forms of administrative discipline:

- Letter of reprimand or censure for the official personnel record of the officer or employee
 - Unsatisfactory performance rating
 - Transfer to another position
 - Suspension from duty without pay
 - Removal from office
-

**Reporting Trust
Fund Control
Violations**

All instances of trust fund administrative control violations must be reported by the Smithsonian unit head — through his or her Under Secretary, or Director, if applicable — to the USF&A/CFO. The USF&A/CFO will coordinate all reported fund control violations associated with Government and non-Government grants and contracts with the Director, OSP. The

**Reporting Trust
Fund Control
Violations (continued)**

violation report must be in writing. Any individual with knowledge of a possible violation has the responsibility to report it. Action taken to correct the cause of the violation does not eliminate the violation; it must still be reported. Use of the Smithsonian Inspector General's hotline at OIGHotline@oig.si.edu or <http://prism.si.edu/oig/form.htm> is acceptable if the individual with the knowledge wants to remain anonymous.

The written violation report (letter) should include the following:

- All pertinent facts of the violation, including the affected specific trust fund(s) and financial system chart field(s), the amount of money involved, the date on which the violation occurred, the primary reason or cause for the violation, and a statement by the responsible officer or employee of any circumstances believed to be extenuating
- The names and positions of the officers or employees responsible for the violation
- The proposed form of discipline or other actions to be taken as recommended by the unit's Under Secretary or Director
- A recommendation by the unit's Under Secretary or Director for safeguards considered necessary to prevent a recurrence of the same type of violation

**Accounting Support
for Fund Control
Systems**

The purpose of the Smithsonian accounting system is to provide full accounting to support the provisions of the Institution's administrative fund control policy, and to provide complete, accurate, and timely budgetary and financial data for each account, including: (1) total budgetary resources available for obligation and expenditure against each control level (trust allocation, revenue, budget, payout, advance, or transfer); and (2) total valid obligations and expenditures incurred to date against each control level.

**Accounting Support
for Fund Control
Systems (continued)**

The reports available from the accounting system serve a variety of needs, providing both detailed and summary information for funding, costs (commitments, obligations, and expenditures), billings, and collections. The data contained in these reports also support financial reporting to external entities such as federal agencies, sponsors, private donors, Smithsonian advisory boards, the OMB, and congressional committees.

The processes and controls included in the accounting system do not relieve the USF&A/CFO, the Deputy Under Secretary for Finance and Administration (DUSF&A), the Comptroller, the Director, OPMB, or the fund holder of the responsibility for ensuring that obligations incurred and expenditures made stay within the limits of available budgetary resources.

Appendix 4 describes, in detail, the relationship between the Smithsonian fund control and financial/accounting systems, and provides a crosswalk between the fund control system and the financial system structure.

CANCELLATION:

INQUIRIES:

NOTE:

RETENTION:

SD 305, July 27, 2009

Office of Planning, Management, and Budget (OPMB)

The "Federal" section of this directive is currently being reviewed by the Office of Management and Budget (OMB) in accordance with OMB Circular A-11

Indefinite. Subject to review for currency 24 months from date of issue

May 2, 2013

RELATIONSHIP BETWEEN SMITHSONIAN ADMINISTRATIVE FUND CONTROL AND FINANCIAL/ACCOUNTING SYSTEMS

Federal Funds

The Smithsonian Financial/Accounting System design is based on the following funding/budgetary structure:

- Fund — The primary fund type that is used to segregate funds available to the Institution by origin, regulations, or intended purpose. Federal fund types are segregated by appropriation (at the highest level) and by period of availability (at a lower level).
 - Fund 000 — Salaries & Expenses, One-Year
 - Fund 007 — Interagency Agreements, One-Year
 - Fund 100 — Salaries & Expenses, No-Year ¹
 - Fund 109 — Salaries & Expenses, Multi-Year (2004/5)
 - Fund 119 — Interagency Agreements, No-Year
 - Fund 120 — Salaries & Expenses, Multi-Year (2005 and later)
 - Fund 127 — Interagency Agreements, Two-Year
 - Fund 045 — Facilities Capital
 - Fund 046 — Legacy Fund (2008)
 - Fund 047 — Legacy Fund (2009)
 - Fund 049 — American Recovery and Reinvestment Act (2009)
- Budget Reference (BudRef) — Identifies the year in which funds were appropriated.
 - 2007 — FY 2007 appropriation
 - 2008 — FY 2008 appropriation
- Designated Code (DSGC) — A secondary funding designator used to categorize Institution-wide programs (such as federal Latino program funding); to designate special interest programs or activities (such as anti-terrorism security initiatives); or to enable congressional budget line-item reporting.
- Department Identification (Dept_ID) — A code used to identify the Smithsonian unit for budget allocation purposes.
- Fund Master Budget — A Smithsonian unit's budget allocation and the lowest level at which administrative control of funds is managed at the Institution.

¹ Includes work funded by other federal agencies through Interagency Transfer Agreements (IATs) under authority of the Economy Act Order. These IATs are segregated from direct no-year Smithsonian appropriations through the use of designated codes.

- **Fund Track Budget** — A Smithsonian unit's annual object class financial plan (used at the unit's discretion); not subject to administrative control of funds.
- **Fund Detail Budget** — A Smithsonian unit's lower level organizational budget (use is optional, at museum, research center, or office head's discretion); not subject to administrative control of funds.
- **Project** — A lower level funding designator used in the financial system to distinguish specific projects within a designated code for managerial and reprogramming tracking purposes. The Facilities Capital appropriation requires use of projects to monitor and report revitalization and construction projects.

A crosswalk between the administrative fund control system and the current financial system structure is provided below.

**Smithsonian Administrative Fund Control
and Financial/Accounting Systems Crosswalk for Federal Funds**

Fund Control Level	Description	Financial Structure	Nature of Violation
Appropriation	Salaries & Expenses (S&E)	Fund+BudRef (Funds 000+100+109+120)	Statutory
	Facilities Capital	Fund+BudRef (Fund 045)	Statutory
	Legacy Fund and American Recovery and Reinvestment Act	Fund + BudRef (Funds 046, 047, 049)	Statutory
Apportionment	Same as appropriation	Same as appropriation	Statutory
Allotment	Same as appropriation	Same as appropriation	Statutory
Allocation	Salaries & Expenses (S&E)	Fund+BudRef+DSGC+Dept_ID (Fund Master Budget)	Non-statutory*
	Facilities Capital (Revitalization and Construction)	Fund+BudRef+DSGC+Dept_ID+Project (Fund Master Budget)	Non-statutory*
	Facilities Capital (Planning & Design)	Fund+BudRef+DSGC+Dept_ID (Fund Master Budget)	Non-statutory*
	Legacy Fund and American Recovery & Reinvestment Act	Fund+BudRef+DSGC+Dept_ID (Fund Master Budget)	Non-statutory
Suballocation	Distribution of Funds by Organization	Fund Detail Budget	Non-statutory
Financial Plan	Distribution of Funds by Object Class	Fund Track Budget	Non-statutory
Reprogramming	S&E	Fund+BudRef+DSGC+Dept_ID (Congressional Budget Line Item)	Non-statutory
Reprogramming	Facilities Capital (Revitalization and Construction)	Fund+BudRef+DSGC+Project (Congressional Budget Line Item)	Non-statutory
Reprogramming	Facilities Capital (Planning & Design)	Fund+BudRef+DSGC (Congressional Budget Line Item)	Non-statutory

* A non-statutory violation at the Smithsonian department level for S&E or at the department, DSGC, and/or project level for Facilities Capital could lead to a statutory violation based on the status of the full appropriation, apportionment, or allotment.

SMITHSONIAN DIRECTIVE 305,
Appendix 2

May 2, 2013

DISTRIBUTION OF AND RESPONSIBILITY FOR FEDERAL FUNDS

Administrative Division	Provided by	Distributed to	Fund Control Responsibility Assigned to	Nature of Violation
Appropriation	Congress/ President	SI	USF&A/CFO and Unit Director	Statutory (Title 31)
Apportionment	OMB	SI	USF&A/CFO, OPMB, and Unit Director	Statutory (Title 31)
Allotment	SI/USF&A/CFO	OPMB	OPMB and Unit Director	Statutory (Title 31)
Allocation	OPMB	Unit Directors	Unit Director	Non-statutory (Administrative)
All Other Federal Fund Distributions	SI/Other	Units	Unit Director	Non-statutory (Administrative)

SMITHSONIAN DIRECTIVE 305,
Appendix 3

May 2, 2013

DISTRIBUTION OF AND RESPONSIBILITY FOR TRUST FUNDS

Administrative Division	SI Fund Codes	Distributed by	Fund Control Responsibility Assigned to
Allocation	401	OPMB	Unit Director
Advance	Any	OT	Unit Director
Award	802, 803	— SAO (for SAO awards only) — OSP (for all other awards)	Unit Director
Payout	6xx	OT	Unit Director
Revenue	402, 800, 801, 805	OC	Unit Director
Transfer (initiated by unit)	Any	OC	Unit Director
Transfer (initiated by SE)	402	OC	Unit Director

May 2, 2013

RELATIONSHIP BETWEEN SMITHSONIAN ADMINISTRATIVE FUND CONTROL AND FINANCIAL/ACCOUNTING SYSTEMS

Trust Funds

The Smithsonian Financial/Accounting System design is based on the following funding and budgetary structure:

- Fund — The primary fund type is used to segregate funds available to the Institution by source and purpose. The Institution's central trust funds are further tracked by period of availability and specified purpose. All remaining trust funds are further tracked only by specified use (purpose).
 - Fund 401 (Central trust); one-year funding
 - Fund 402 (Unit discretionary); no-year funding
 - Fund 610 (Endowment — True Donor Designated); no-year funding
 - Fund 620 (Endowment — True Board Designated); no-year funding
 - Fund 640 (Endowment — Quasi-Donor Designated); no-year funding
 - Fund 650 (Endowment — Quasi-Board Designated); no-year funding
 - Fund 800 (Construction Gift Contributions); no-year funding
 - Fund 801 (Donor Contributions); no-year funding
 - Fund 802 (Non-Government Grants and Contracts); no-year funding subject to conditions of award/contract document
 - Fund 803 (Government Grants and Contracts); no-year funding subject to conditions of award/contract document
 - Fund 805 (Trust Capital); no-year funding
- Budget Reference (BudRef) — Identifies the year in which funds are available for obligation. All trust funding sources, except for central trust (Fund 401), are available until expended. Fund 401 monies are treated as one-year funding.¹
 - 0000 — designates a trust fund that is treated as no-year funding
 - 2005 — FY 2005 Fund 401 allocation
 - 2006 — FY 2006 Fund 401 allocation
- Designated Code (DSGC) — A secondary funding designator used to specify the purpose for a subset of funds. The DSGC is used to categorize Institution-wide programs (such as Fund 401 fundraising allocations or Fund 402 unit discretionary) and to separate individual restricted trust gifts, endowments, grants, contracts, and advances for internal control purposes.
- Department Identification (Dept_ID) — A code used to identify the Smithsonian unit for budget allocation and control of funds purposes.

¹ Additionally, Funds 802 and 803 are subject to award/contract timing constraints.

- **Fund Master Budget** — A Smithsonian unit's budgetary authority (in the form of an allocation, advance, award, payouts, revenue, transfer) and the lowest level at which administrative control of funds is managed at the Institution for allocations, advances, payouts, revenues, and transfers. The Fund Master Budget represents the combination of Fund, Budget Reference, Department ID, and Designated Codes.
- **Fund Track Budget** — A Smithsonian unit's object class financial plan. Use of the Fund Track budget is optional for all trust divisions of funds, except for Government and non-Government grants and contracts (Funds 802 and 803), where its use is mandatory. The Fund Track budget is the lowest level at which administrative control of funds is managed at the Institution for all grants and contracts. The Fund Track budget represents the combination of Fund, Budget Reference, Department ID, Designated Code, and class code.

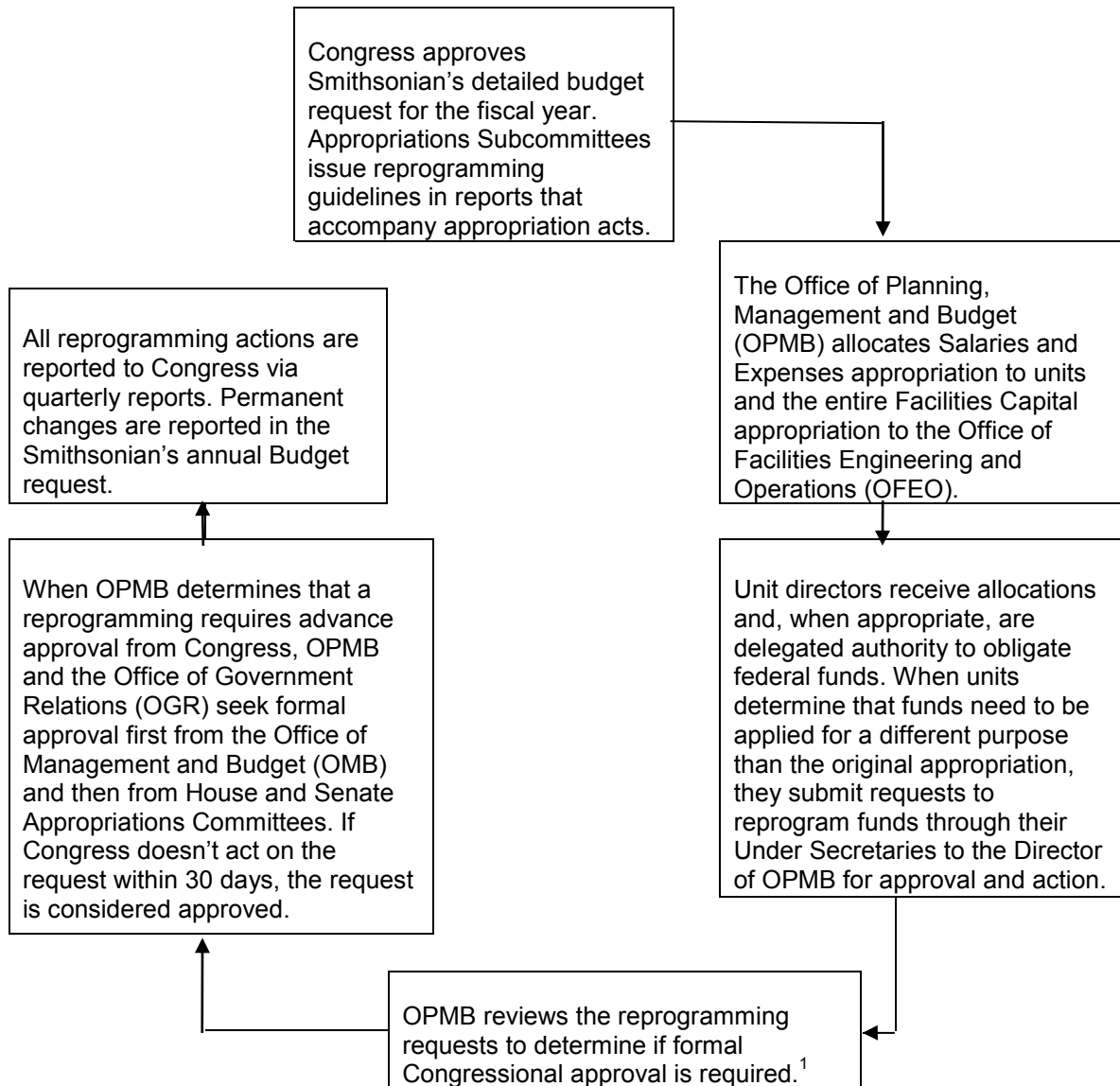
A crosswalk between the administrative fund control system and the financial system structure is provided below.

**Smithsonian Administrative Fund Control
and Financial/Accounting Systems Crosswalk for Trust Funds**

Fund Control Administrative Division	Applicable for these SI Funds	Financial Structure for Administrative Control	Nature of Violation
Allocation	Fund 401	Fund+BudRef+Dept_ID+DSGC	Administrative
Advance	Any Fund	Fund+BudRef+Dept_ID+DSGC	Administrative
Award	Fund 802	Fund+BudRef+Dept_ID+DSGC+ Object Class Code	Administrative
	Fund 803	Fund+BudRef+Dept_ID+DSGC+ Object Class Code	Administrative, Non-statutory, or Statutory
Payout	Funds 6xx	Fund+BudRef+Dept_ID+DSGC	Administrative
Revenue	Funds 402, 800, 801, 805	Fund+BudRef+Dept_ID+DSGC	Administrative
Transfer	Any Fund	Fund+BudRef+Dept_ID+DSGC	Administrative

May 2, 2013

SMITHSONIAN INSTITUTION INTERNAL REPROGRAMMINGS



¹ A reprogramming includes the reallocation of funds from one activity or line item to another within an appropriation, or any significant departure from a program, project, or activity described in the Smithsonian's budget justification as presented to and approved by Congress. For construction projects, a reprogramming constitutes the reallocation of funds from one construction project identified in the justifications to another or a significant change in the scope of an approved project. A reprogramming must be submitted to the House and Senate Committees in writing prior to implementation if it exceeds \$1 million or results in an increase or decrease of more than 10 percent annually in affected budget line items, programs, projects or activities.

May 2, 2013

Delegation of SD 305 Funds Control Authority by Unit Directors to Designated Officials

In accordance with SD 305, *Administrative Control of Funds*, you are hereby delegated authority for fund control related to the obligation and expenditure of Smithsonian Institution (SI) funds. This authority assigns you the responsibilities to:

- Ensure that obligations and expenditures do not exceed federal and trust allocations, internal advances, awards, payouts, revenues, and/or transfers
- Ensure that federal obligations and expenditures are for the purposes intended in the appropriation bill and that they satisfy the bona fide need statute
- Ensure that trust obligations and expenditures are for the purposes specified by donors and sponsors, and that all trust obligations and expenditures comply with Smithsonian funding guidelines related to purpose and use of trust funds
- Adhere to all restrictions and limitations on funds provided in allocation memoranda.

Employee name:	
Employee title:	
Employee signature acknowledging delegation:	
Effective date:	

Your authorities are limited to the following fund accounts, as checked below:

Check Box	Fund Category	Enter All Applicable Fund Codes here:	If delegated authority is limited to specific Designated Codes, enter those here:
	Federal		
	Unrestricted Trust		
	Restricted Trust		

Unit Director's name:	
Director's signature:	
Official title:	
Date signed:	



SMITHSONIAN DIRECTIVE 312,

December 13, 2011,
Date Last Declared Current: May 13, 2013

TRAVEL

Purpose	1
Background	1
Policy	2
Responsibilities	2
Guidelines	4
Applicability	4

Purpose

This directive sets forth travel policies for Smithsonian Institution (SI) employees, associates, and invited guests. All SI units are directed to comply with the guidelines contained in the SI *Travel Handbook*.

Background

The SI *Travel Handbook* is available at the Travel webpage on the Prism website. The handbook provides procedures for implementation and technical guidance, as well as information for achieving the standards outlined.

The SI *Travel Handbook* contains detailed information about the following:

- Travel Authorization
- Travel Expense Reimbursement
- Per Diem Allowances, Miscellaneous Expenses, and Travel Advances
- Domestic and Local Travel Expenses
- International Travel Expenses
- Spousal Travel
- Relocation
- Sponsored Travel
- Large Group Travel
- Travel Cards
- Post-payment Audit of Travel Vouchers

Background (continued)

The *SI Travel Handbook* is a living document that is periodically updated to reflect current changes in regulatory guidance. Procedural changes may include but are not limited to per diem rates, travel voucher requirements, and allowable miscellaneous expenses. It is recommended that SI employees who travel on official Smithsonian business review the *Handbook* at least once a year.

Questions regarding the *Travel Handbook* should be directed to the Office of Contracting and Personal Property Management (OCon&PPM) Travel Management Office (TMO). Contact information is available at the Travel webpage on the Prism website.

Policy

The SI travel policies and procedures conform to the Federal Travel Regulations (FTR) issued by the General Services Administration (GSA), which can be found at www.gsa.gov. Only travel essential to the performance of official SI business, whether by SI employees, research associates, or invitational travelers (i.e., individuals who are not SI employees), and for which travel-related expenses are to be paid by the Smithsonian, can be approved, authorized, and reimbursed in accordance with this directive and the *SI Travel Handbook*. The SI travel policies and procedures provide the Institution adequate flexibility to support the travel needs of SI staff and those who travel at Smithsonian expense. Compliance with SI travel policies and procedures is required by all SI employees, unless special circumstances justify otherwise and deviation from SI travel policy and procedures is requested, reviewed and approved in advance.

Responsibilities

The **Office of Contracting and Personal Property Management (OCon&PPM)** is responsible for maintaining the travel policies and procedures for the Smithsonian Institution. These responsibilities are further detailed as follows:

- The **Office of Contracting and Personal Property Management (OCon&PPM)** is responsible for

Responsibilities
(continued)

conducting compliance reviews of approved travel vouchers.

- The **Office of the Comptroller (OC), Financial Information Processing Division (FIPD)** is responsible for making timely payments on travel claims.
- The **OCon&PPM Travel Management Office (TMO)** is responsible for supporting the GovTrip system that is used to process all travel authorizations and vouchers. SI employees with questions about travel authorizations and voucher processing in GovTrip should contact the **TMO Help Desk** for more information. This information, as well as TMO contact information, is available at the Travel webpage on the Prism website.

The **Office of Contracting and Personal Property Management (OCon&PPM), Charge Card Program Manager and Simplified Acquisitions Division** is responsible for establishing and maintaining procedures for application, approval and requesting contracted bank providers to issue Government travel cards to SI employees. The **Charge Card Program Manager** is also responsible for monitoring use of Government travel cards by SI employees and for reporting internally, and externally when required, any instance of misuse or abuse of travel card policies and procedures by SI employees.

The SI **Office of International Relations** provides SI employees with passport and visa application assistance.

The SI **Occupational Health Unit** provides immunizations to all SI employees traveling abroad.

Directors of Museums, Research Centers and Offices are responsible for and accountable to the Under Secretary for Finance and Administration/Chief Financial Officer for ensuring compliance with SI travel policies and procedures by all employees within their organization, regardless of status or location of work performance.

Responsibilities (continued)	All travel that is undertaken by SI employees or anyone travelling at SI expense must comply with the standards, policies, and guidance contained in this directive and in the <i>Travel Handbook</i> .
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Guidelines	As a trust establishment of the United States, the Smithsonian has a travel policy that conforms to the FTR. SI policies further state that the travel must be essential to the performance of the individual's SI responsibilities.
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Applicability	These Smithsonian Institution travel policies apply to all travel of SI employees and those authorized to travel at the SI's expense (i.e., SI employees and eligible persons who are not SI employees). Regents' travel reimbursement is governed by separate statute, 20 <i>United States Code</i> (U.S.C.) Section 44.
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CANCELLATION: INQUIRIES: RETENTION:	SD 312, August 4, 2009 Office of Contracting and Personal Property Management (OCon&PPM) Indefinite. Subject to review for currency 24 months from date of issue
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WAREHOUSE SUPPLIES, FORMS AND SERVICES

Purpose	1
Policy	2
Authorities and Responsibilities	3
Requesting Supplies and Forms	3
Delivery and Retrieval of Supplies,	
Forms and Excess Personal Property	4
Receiving and Returning Stock Items	4
Appendix A, Supplies Available from the Office of Contracting and Personal Property (OCon&PPM) Warehouse	
Appendix B, Forms Available from the OCon&PPM Warehouse	
Appendix C, Forms Available Online	
Appendix D, Forms No Longer Available from the OCon&PPM Warehouse	
Appendix E, OCon&PPM Delivery and Pickup Schedule	

Purpose

This Smithsonian Directive (SD) provides information about the supplies and forms available from the Office of Contracting and Personal Property Management (OCon&PPM) warehouse, and the policies and procedures for requesting and returning supplies and unused forms to the warehouse. This SD also includes information on the schedules for delivery and retrieval of supplies and forms and excess personal property items to and from Smithsonian Institution (SI) museums, research centers and offices (units).

Copies of this SD are available on Prism at <http://prism2.si.edu/SIOrganization/OCFO/OPMB/Pages/SDs.aspx>, and on the OCon&PPM Prism website under "OCon&PPM Forms/References," and through "SI Directives," at <http://prism.si.edu/ocfo/ocon/ocon.htm>.

Policy

The OCon&PPM warehouse shall maintain stock of SI stationery, copy machine paper, limited other paper office supplies, and copies of SI-wide and Government-wide forms not available electronically on Prism or other federal agencies' websites, in quantities sufficient to meet the recurring needs of SI units. Schedules for delivery of requisitioned items to the units, and/or retrieval of any excess personal property items from the units, shall be maintained by the Warehouse Operations Section, OCon&PPM.

All stocked items shall be for use by SI employees only in performance of official SI business. Units shall request items in quantities commensurate with actual needs.

Authorities and Responsibilities

Office of Contracting and Personal Property Management (OCon&PPM)

The Property Manager (PM), OCon&PPM, is responsible for ensuring that appropriate quantities of forms and supplies are maintained on hand at the OCon&PPM warehouse, and for maximizing economies of scale when purchasing supplies to be stocked.

OCon&PPM maintains listings of supplies and forms stored and available to SI units, as well as forms no longer available from the warehouse. The staff in the Warehouse Operations Section, OCon&PPM, also maintain a list of forms that they know are available on Prism or other agencies' websites. The lists are contained in the following appendices to this SD:

- **Appendix A**, Supplies Available from the OCon&PPM Warehouse (formerly SI Stock Catalog);
- **Appendix B**, Forms Available from the OCon&PPM Warehouse;
- **Appendix C**, Forms Available Online: in addition to the links to the SI and other agencies' websites listed, these forms may also be available on Prism under "Forms";

Authorities and Responsibilities
(continued)

- **Appendix D**, Forms No Longer Available from the OCon&PPM Warehouse; and
- **Appendix E**, OCon&PPM Delivery and Pickup Schedule

Supplies and forms listed in Appendices A and B are to be requested by SI units via the OCon&PPM Warehouse Operations Website (OWOW). OWOW is the Web-based ordering system accessible at <http://sagepro.si.edu>. An OWOW *User Guide* and OWOW user list are available under “Smithsonian Forms,” which is accessible from the Prism homepage and from the OCon&PPM portion of the Office of the Chief Financial Officer (OCFO) website at <http://prism.si.edu/ocfo/ocon/ocon.htm> under “OCon&PPM Forms/References” and “SI Directives.”

Directors of Museums, Research Centers, and Offices

Unit directors, or their designees, are authorized to approve requests for stocked supplies and forms to the OCon&PPM warehouse through the automated OWOW.

Requesting Supplies and Forms

Unit directors, or their designees, shall submit properly completed electronic OWOW requests to the OCon&PPM warehouse staff at least 10 workdays in advance of the actual date that supplies are required.

Upon transmittal of a properly completed request for stocked supplies and forms via OWOW, the system will generate a receipt with a confirmation number. The confirmation number serves as an acknowledgement that the request was received by the OCon&PPM warehouse personnel, who will immediately take action to fulfill the order.

When a requested item or form is not available, or in cases when the item or form is no longer stocked at the OCon&PPM warehouse, the OCon&PPM warehouse

**Requesting Supplies
and Forms (continued)**

staff will send an OWOW response email to the unit, indicating that the item is no longer in stock. Due to the number of OWOW requests received by OCon&PPM warehouse staff, requests sent via U.S. Postal Mail, inter-office mail, telephone or fax will not be accepted.

**Delivery and
Retrieval of Supplies,
Forms and Excess
Personal Property**

The OCon&PPM warehouse staff shall deliver requisitioned stocked forms and supplies to units during the first and third weeks of each month, and pick up items for return to the warehouse and excess personal property items during the second and fourth weeks of each month.

See **Appendix E**, OCon&PPM Warehouse Delivery and Pickup Schedule, for information on the day of the week when you may expect deliveries and pickups to and from your unit to be scheduled by the OCon&PPM warehouse staff.

When a delivery or pickup schedule must be adjusted due to holidays or other circumstances, the OCon&PPM warehouse staff shall notify the ordering unit of an alternative supply delivery or pickup date.

**Receiving
and Returning
Stock Items**

Receiving stock. Unit staff designated to receive items requested from the OCon&PPM warehouse shall be required to sign the Picking Ticket presented by warehouse staff at the time of delivery. The receiving individual shall verify that items being delivered are the items requested from the original or modified automated OWOW request.

When a delivery location must be changed from the initial listing on the OWOW request, the new delivery location and the name of the unit director or designee authorized to sign for the supplies must be corrected on the electronic OWOW request. The new delivery location and name of the individual authorized to sign at time of delivery shall be indicated in the

**Receiving
and Returning
Stock Items**
(continued)

“ADDITIONAL NOTES” field in the OWOW request, located in the shopping cart under each requested supply item.

When items delivered and listed on the Picking Ticket are not the items requested on the original automated OWOW request, or if items are not delivered, the unit shall contact the OCon&PPM warehouse staff to request the appropriate exchange or delivery. A new automated OWOW request is not required and OCon&PPM warehouse staff shall deliver the correct items when they are in stock.

OCon&PPM warehouse staff shall leave the Packing Slip copy with the individual who signs for the delivery.

Returning stock and scheduling Excess Personal Property Pickups. To return supplies and forms to the OCon&PPM warehouse, the unit director or designee shall contact the OCon&PPM warehouse staff to arrange a pickup date and time by emailing OCon_PPMwarehouse@si.edu.

To schedule pickups of excess personal property items, a properly completed SI-707, Property Transaction Form, should be submitted to the OCon&PPM warehouse.

The OCon&PPM warehouse staff shall confirm scheduled pickups with staff at the requesting unit.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 316, January 2, 2008
Office of Contracting and Personal Property Management (OCon&PPM)
Indefinite. Subject to review for currency 24 months from date of issue

SMITHSONIAN DIRECTIVE 316,
Appendix A

August 2, 2010

LIST OF SUPPLIES AVAILABLE FROM THE OCON&PPM WAREHOUSE

Item Description	Unit of Issue	Item No.
CALENDARS		
Executive, loose leaf type, 3 5/8" x 5 7/8"	EACH	751-215
Wall Type, 11 5/8" x 9 5/16"	EACH	751-218
ENVELOPES		
Kraft, printed, side opening 7 1/2" x 10 1/2"	EACH	753-046
Kraft, plain, side opening 8 1/2" x 11 1/2"	EACH	753-048
Kraft, plain, side opening 9 1/2" by 12"	EACH	753-049
Routing and Transmittal Slip, 100/pad (OF-41)	PAD	754-316
Messenger Envelope (SF 65b); U.S. Government (string button type) 9 1/2" by 12"	EACH	754-132
Messenger Envelope (SF 65c); U.S. Government (string button type) 12" x 16"	EACH	754-133
Blue, RCN, 13" x 10"	EACH	753-177
SMITHSONIAN INSTITUTION STATIONERY SUPPLIES		
Letterhead: Smithsonian Institution, engraved, vellum finish, 100 per pkg., 8 1/2" x 11"	PKG	753-130
Paper: Vellum finish, use with engraved letterhead as subsequent sheets, 100 per pkg., 8 1/2" x 11"	PKG	753-132
Envelope: White, Secretary, 4 3/8" x 9 1/2", 500 per box	BOX	753-043
Envelope: White, 4 1/8" x 9 1/2", printed, franked, side opening, 500 per box	BOX	753-058
Envelope: White, window 4 1/8" x 9 1/2", printed, side opening, 500 per box	BOX	753-060
COPY MACHINE PAPER		
Letter size, 10 reams per carton 8 1/2" x 11", Virgin Paper	CTN	753-175
Letter size, 10 reams per carton 8 1/2" x 11", Recycled Paper	CTN	753-180
LABELS		
Mailing, 100 per pad	PAD	916-006

SMITHSONIAN DIRECTIVE 316,
Appendix B

August 2, 2010

FORMS AVAILABLE FROM THE OCON&PPM WAREHOUSE

Many Smithsonian Institution (SI) and Government-wide forms previously maintained in stock by the Office of Contracting and Personal Property Management (OCon&PPM) warehouse are now available on Prism at <http://prism.si.edu/administrative/forms.htm>, or on the appropriate Smithsonian office/unit Prism websites. Government-wide forms may also be available on federal agencies' websites. Please review Appendix C and contact the appropriate Smithsonian administrative or program office for information regarding any required form which does not appear on this list or if you have difficulty accessing a required form from the websites listed in Appendix C.

[illegible]

SMITHSONIAN DIRECTIVE 316,
Appendix C

August 2, 2010

FORMS AVAILABLE ONLINE

Many Smithsonian Institution and Government-wide forms previously available from the Office of Contracting and Personal Property Management (OCon&PPM) warehouse are now available on Prism at <http://prism.si.edu/administrative/forms.htm>, or on the appropriate Smithsonian office/unit Prism websites. Government-wide forms may also be available on federal agencies' websites. Please contact the appropriate Smithsonian administrative or program office for information on where to obtain copies of required forms that do not appear on this list or in Appendix B, or if you have difficulty accessing a form from the websites here.

Form No.	Title	Website
AD-332	Position Description Cover Sheet, Federal (see SI-63 for Trust)	http://ohr.si.edu
AD-349	Privacy Act Notice Declaration Sheet 3-part form	http://www.fsis.usda.gov/OM/HRD/pubform/Misc/ad349.pdf
FMS-2231 (Formerly SF-1199A)	Fast Start Direct Deposit Sign-up Form	http://ohr.si.edu
OCon-1 (Formerly SI-3828b)	Request for Procurement Authority	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-100 (Formerly SI-655)	Contracting w/Individuals Screening Checklist (SI Evaluation Checklist for Services Contracts)	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-102	Contracting Officer's Technical Representative (COTR) Delegation of Authority Clause	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-106 (Formerly SI-877a)	Abstract of Quotations/Purchase Action	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-200	SI Property Tag Request Form	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-201	Accountable Property Officer Nomination Form	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-400	Application for Delegation of Purchase Card Authority	http://prism.si.edu/ocfo/ocon/ocon_forms.htm

Smithsonian Directive 316, Appendix C,
08/02/10

Form No.	Title	Website
OCon-410	Request to Waive Restriction on the Use of Purchase Cards to Acquire Sensitive Personal Property Items	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-501 (Formerly SI-3877)	Field Expenses Review and Authorization (Authorization of Expenses Other than Traveler Transportation, Lodgings and Per Diem incurred and paid during official travel)	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OCon-520	Background Investigation and Credentials for Contractor's Personnel	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
OSHEM-1 (Formerly OEMS-1)	Overtime Utilization	http://ofeo.si.edu/safety_health/docs/ohsovertime4-06.doc
OF-41	Routing and Transmittal Slip	http://www.gsa.gov/Portal/gsa/ep/formslibrary.do?formType=OP
OF-612	Optional Application for Federal Employment	http://ohr.si.edu
OP-363	Memorandum of Call	http://www.gsa.gov/Portal/gsa/ep/formslibrary.do?formType=OP
OPM-71 (Formerly SF-71)	Request for Leave or Approved Absence	http://ohr.si.edu
SF-8	Notice to Federal Employees about Unemployment Insurance	http://www.gsa.gov/Portal/gsa/ep/formslibrary.do?formType=OP
SF-39	Request for Referral of Eligibles, 4-part form	http://ohr.si.edu
SF-52	Request to Personnel Action, Federal (see SI-610 for Trust)	http://ohr.si.edu
SF-1038	Advance of Funds Application and Account	http://www.gsa.gov/forms
SF-1103	U.S. Government Bill of Lading	http://www.gsa.gov/forms
SF-1164	Claim for Reimbursement for Expenditures on Official Business	http://prism.si.edu/siforms/forms.html
SI-23	Request for Building Services, (8-part set)	http://prism.si.edu/siforms/forms.html

Smithsonian Directive 316, Appendix C,
08/02/10

Form No.	Title	Website
SI-63 (Formerly SI-632)	Position Description Cover Sheet, Trust (see AD-332 for Federal)	http://ohr.si.edu
SI-122	Request for Excess Personal Property	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SI-147a	Purchase Order Terms and Conditions	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SI-480	Request for Safety Glasses	http://ofeo.si.edu/safety_health/osemhome.asp
SI-600	Application for Facilities for Special Events, 7-part form	http://prism.si.edu/siforms/forms.html
SI-604	Exit Clearance	http://prism.si.edu/administrative/forms.htm
SI-610	Request for Personnel Action, Trust (see SF-52 for Federal)	http://prism.si.edu/administrative/forms.htm
SI-707	Property Transaction Form	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SI-777	Smithsonian Institution Summary Performance Appraisal	http://ohr.si.edu
SI-778	Smithsonian Institution Performance Plan	http://ohr.si.edu
SI-778c	Performance Plan	http://ohr.si.edu
SI-800	Requisition for Photographic Services	http://prism.si.edu/administrative/forms.htm
SI-1435	Request, Authorization, Agreement, and Certification of Training, 10-part form	http://ohr.si.edu
SI-2120	Occupational Injury and Illness Report	http://ofeo.si.edu/safety_health/docs/si_2120.doc
SI-2747	Timekeeper Appointment & Signature Verification	http://prism.si.edu/ocfo/oc/oc_forms.htm
SI-3345	Request for Use of Foreign Carrier	http://prism.si.edu/ocfo/oc/oc_forms.htm
SI-3389	Request for Safety Shoes	http://ofeo.si.edu/safety_health/osemhome.asp
SI-3417	Collections Damage Report Form	http://prism.si.edu/pdf/siforms/damage-loss-report.pdf
SI-3522	Report of Survey for Missing, Damaged or Destroyed Property Form	http://prism.si.edu/ocfo/ocon/ocon_forms.htm

Smithsonian Directive 316, Appendix C,
08/02/10

Form No.	Title	Website
SI-3726	Vendor Invoice	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SI-3861 Form no longer needed (see instructions)	Operator's Complaint Form	http://ofeo.si.edu/services/index_request.asp Instructions: Under Request Services by Building , click the link for the building where services are needed.
SI-3972 (see Mail Services Guide PDF)	Request for Mail Services	<i>Mail Services Guide</i> (Page 25) * http://ofeo.si.edu/offices/ofmr/mss/mail/Mail%20Services%20Guide%20Final%20for%20Publication%2009%2027%2005.pdf
SI-4003 (see Mail Services Guide PDF)	Change of Address	<i>Mail Services Guide</i> (Page 5) * http://ofeo.si.edu/offices/ofmr/mss/mail/Mail%20Services%20Guide%20Final%20for%20Publication%2009%2027%2005.pdf
SI-4007	GSA Customer Supply Center/ Industrial Products Center Order Sheet	GSA Catalog renders the form obsolete. https://www.gsaglobalsupply.gsa.gov
SI-4008	Application for Identification Credentials	http://prism.si.edu/administrative/forms.htm
SI-4057 (Formerly SI-1442)	Address Designation (Payroll Section Home Address and/or Authorization to Mail Paycheck and/or Request for Change)	http://wohr.si.edu/FormsT/FormsMainT.htm Common Forms and Publications
SI-4059	Service Request Form (Formerly: Discrepancy Letter)	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SI-4154	Time-off Awards <i>Nomination and Approval Form</i>	http://ofeo.si.edu/offices/rm/HRDocuments/Time-off_Award_Form.doc
SI-4554	Property Assignment Receipt Form	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SI-4555	Personal Property Pass Authorization Form	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
SISP_Nov06 (Formerly SI-36)	New Manuscript Submission Form (Submission of Manuscript to SI Press for Series Publication)	http://www.scholarlypress.si.edu/content.cfm?page=Subm under new SISP New Submission Form, See Appendix C

* <http://ofeo.si.edu/offices/ofmr/mss/mail/Mail%20Services%20Guide%20Final%20for%20Publication%2009%2027%2005.pdf>

SMITHSONIAN DIRECTIVE 316,
Appendix D

August 2, 2010

FORMS NO LONGER AVAILABLE FROM THE OCON&PPM WAREHOUSE

Form No.	Title	Status
OCPM 1	Unit Blanket Purchase Agreement	Use Discontinued.
OEMS-1	Overtime Utilization	Now OSHEM-1, See Appendix C, Forms Available Online.
OPM-71 (formerly SF-71)	Request for Leave or Approved Absence	http://ohr.si.edu
SF-8	Notice to Federal Employees about Unemployment Insurance	http://www.gsa.gov/Portal/gsa/ep/formslibrary.do?formType=OP
SF-39	Request for Referral of Eligibles, 4-part form	http://ohr.si.edu
SF-52	Request for Personnel Action, Federal (see SI-610 for Trust)	http://ohr.si.edu
SF-71	Request for Leave or Approved Absence	Now OPM-71. See Appendix C, Forms Available Online.
SF-1012	Travel Voucher	GovTrip System renders the form obsolete.
SF-1012a	Advance of Funds Application and Account	GovTrip System renders the form obsolete.
SF-1034	Public Voucher for Purchase and Services Other Than Personal, 4-part	GovTrip System renders the form obsolete.
SF-1035	Public Voucher for Purchase and Services Other Than Personal, continuation sheet, 4-part	GovTrip System renders the form obsolete.
SF-1165	Receipt for Cash	Use Discontinued.
SF-1199A	Fast Start Direct Deposit Sign-up Form	Now FMS-2231, See Appendix C, Forms Available Online.
SI-3	Stock Requisitions, 3 pt set, 25 sets per pad	OCon&PPM Warehouse Operations Website (OWOW) System renders the form obsolete.
SI-4	Smithsonian Institution Requisition for Goods and Services	PeopleSoft renders the form obsolete.
SI-4b	Requisition for Lecturer	Use Discontinued.
SI-15	Authorization of Official Travel	GovTrip System renders the form obsolete.
SI-36	Submission of Manuscript to SI Press for Series Publication	Now SISP_Nov06, See Appendix C, Form Available Online at http://www.scholarlypress.si.edu/content.cfm?page=Subm under SISP New Submission Form, See Appendix C

Smithsonian Directive 316, Appendix D,
08/02/10

Form No.	Title	Status
SI-318	Smithsonian Institution Photograph Order	Use Discontinued.
SI-484	Smithsonian Institution Blanket Travel Auth., Projected Itinerary Expense, 6-part set	GovTrip System renders the form obsolete.
SI-628a	Blanket Authorization for Payment and Batch Certification	Use Discontinued.
SI-632	Position Description Cover Sheet, Trust	Now SI-63, See Appendix C, Forms Available Online.
SI-641	Loan of Non-expendable Property	Use Discontinued.
SI-655	SI Evaluation Checklist for Services Contracts	Now OCon-100, See Appendix C, Forms Available Online.
SI-700	Smithsonian Institution OC Receiving Report	PeopleSoft renders the form obsolete.
SI-877a	Abstract of Quotations/ Purchase Action	Now OCon-106, See Appendix C, Forms Available Online.
SI-945	Secretarial Correspondence Routing Slip (4/11/78)	Use Discontinued.
SI-1055	Notice to Labor Force	Use Discontinued.
SI-1442	Payroll Section Home Address and/or Authorization to Mail Paycheck and/or Request for Change	Now SI-4057, See Appendix C, Forms Available Online.
SI-2668	Printing and Duplicating Request	Use Discontinued.
SI-2907	Non-expendable Property Organization Listing Add-on Sheet	Use Discontinued.
SI-2940	Permission Request (OPPS)	Use Discontinued.
SI-3010	Relocation Allowance Supplement to SI-15	Use Discontinued.
SI-3010a	Travel and Transportation Relocation Agreement (Federal)	Use Discontinued.
SI-3010b	Travel and Transportation Relocation Agreement (Trust Fund)	Use Discontinued.
SI-3010c	Request for Relocation Service	Use Discontinued.
SI-3073	Reporting Time and Attendance on Traumatic Injury Cases	AIRs System renders the form obsolete.

Smithsonian Directive 316, Appendix D,
08/02/10

Form No.	Title	Status
SI-3140	Smithsonian Institution Consolidation Invitational Travel Auth./Voucher	GovTrip System renders the form obsolete.
SI-3140a	Smithsonian Institution Consolidated Invitational Travel Auth./Voucher (Continuation Sheet)	GovTrip System renders the form obsolete.
SI-3143	Property Pass	Now SI-4153, See Appendix C, Forms Available Online.
SI-3417	Damage Report Form	Now SI-3417 Collections Damage Report Form, See Appendix C, Forms Available Online.
SI-3453	Use of Official Time for Representational Functions	Use Discontinued.
SI-3523	Request for Use of Non-Contract Carrier	GovTrip System renders the form obsolete.
SI-3726	Invoice, 3-part set	Available until stock is depleted at the warehouse; may be obtained online — See Appendix C.
SI-3828b	Request for Procurement Authority	Now OCon-1, See Appendix C, Forms Available Online.
SI-3861	Operator's Complaint Form	OFEO renders the form obsolete. See Appendix C, Forms Available Online
SI-3877	Authorization of Official Travel and Payment of Field Expenses	Now OCon-501, See Appendix C, Forms Available Online.
SI-3878	Multiple Travel Fund	GovTrip System renders the form obsolete.
SI-3972	Request for Mail Services Mail Services Branch Office of Plant Services	<i>Mail Services Guide</i> (Page 25) renders the form obsolete: http://ofeo.si.edu/offices/ofmr/mss/mail/Mail%20Services%20Guide%20Final%20for%20Publication%2009%2027%2005.pdf
SI-4003	Change of Address	<i>Mail Services Guide</i> (Page 5) renders the form obsolete: http://ofeo.si.edu/offices/ofmr/mss/mail/Mail%20Services%20Guide%20Final%20for%20Publication%2009%2027%2005.pdf

SMITHSONIAN DIRECTIVE 316,
Appendix E

August 2, 2010

OCON&PPM WAREHOUSE DELIVERY AND PICKUP SCHEDULE

The Office of Contracting and Personal Property Management (OCon&PPM) warehouse staff shall schedule and deliver requisitioned, stocked forms and supplies to units during the first and third weeks of each month, and pick up items for return to the warehouse, and excess personal property items, during the second and fourth weeks of each month. To schedule pickups of items, contact the warehouse staff via email at: OCon_PPMwarehouse@si.edu.

Deliveries 1st and 3rd Weeks in a Month	Pickups 2nd and 4th Weeks in a Month	Units Scheduled
Mondays		<ul style="list-style-type: none"> • National Museum of American History (NMAH) • National Museum of Natural History (NMNH)
Tuesdays		<ul style="list-style-type: none"> • Crystal City (CC) Plaza, Arlington, VA • Aerospace Building • L'Enfant Plaza (LEN) • Stephen F. Udvar-Hazy Center, Chantilly, VA • Capital Gallery (CG) Building • Herndon, VA (OCIO) and (SE)
Wednesdays		<ul style="list-style-type: none"> • Smithsonian Institution Building (SIB, aka The Castle) • National Museum of the American Indian (NMAI) — Mall Museum • National Air and Space Museum (NASM) • Quadrangle Building (QUAD) (aka Ripley Center) • Hirshhorn Museum and Sculpture Garden (HMSG) • Freer-Sackler Galleries of Art (FSGA) • Arts and Industries Building (AIB)
Thursdays		<ul style="list-style-type: none"> • Smithsonian Environmental Research Center (SERC), Edgewater, MD • NMNH Museum Support Center (MSC), Suitland, MD • NMAI Cultural Resources Center (CRC), Suitland, MD • Museum Conservation Institute (MCI), Suitland, MD • Anacostia Community Museum (ACM)
Fridays		<ul style="list-style-type: none"> • Victor Building (VB) • National Postal Museum (NPM) • Donald W. Reynolds Center (National Portrait Gallery [NPG] and Smithsonian American Art Museum [SAAM]) • Renwick Gallery (REN) • National Zoological Park (NZIP)

Units not listed are serviced by outside vendors.

EXTERNALLY FUNDED SPONSORED PROJECTS

Background	1
Purpose	2
Definitions	2
Process to Accept External Funding Agreements	5
Signature Authority for Incoming Funds	6
Signature Authority for Outgoing Funds	6
Hybrid Agreements	7
Summary Table of Agreements and Signature Authority	7
References	8

Background

The Smithsonian, as a non-profit organization, receives significant funding from external entities through sponsored project agreements. Sponsored projects can take the form of grants, sponsored project contracts, cooperative agreements, or interagency agreements paid through interagency transfers.

It is important that externally funded grants, sponsored project contracts, cooperative agreements, or interagency agreements, whether they originate from private or government sources, be handled according to the specific terms outlined in the awarding document. Proper stewardship of such funds is legally required and is critical to ensure no audit findings and to maintain a good relationship with the sponsor.

The Office of Sponsored Projects (OSP) provides guidance and assistance in the submission, negotiation and management of all the types of awards defined in this directive. Proposal submission requirements are described in SD 321, *Review and Submission of Proposals for Sponsored Projects*, and in OSP's *Guide to Sponsored Projects*.

Note that application of indirect costs or Administrative Support and Project Oversight (AS/PO) is detailed in

Background
(continued)

SD 304, *Guidelines for Administering Indirect Cost (Overhead) Rates and Charges*. All externally funded grants, sponsored project contracts, cooperative agreements, and interagency agreements must be financially managed in compliance with SD 301, *Financial Management Accounting Practices and Procedures*.

Purpose

This directive defines the types of externally funded sponsored project agreements entered into by the Smithsonian, and provides guidance in identifying the management official with authority to sign the grant, sponsored project contract, cooperative agreement, or interagency agreement.

This directive does not apply to Smithsonian revenue-generating contracts and agreements executed or administered by the Office of Contracting and Personal Property Management (OCon&PPM) or Smithsonian Enterprises (SE), e.g., product development and licensing contracts, or IMAX film agreements. See SD 314, *Contracting*, for more information.

This directive does not apply to Smithsonian gifts or corporate sponsorships. See SD 809, *Philanthropic Financial Support*, for more information.

Definitions

Definitions used by funding sources may be imprecise and conflict with definitions used by the Smithsonian. The Smithsonian's definitions of funding instruments given here conform to the audit guidelines of the American Institute of Certified Public Accountants (AICPA) and guidelines issued by the National Association of College and University Business Officers (NACUBO).

Government Cooperative Agreement — An arrangement between the Smithsonian and a government entity. A government entity awards a cooperative agreement when it desires active and substantial participation in the project, or when its internal procedures warrant the use of a cooperative

Definitions
(continued)

agreement rather than a grant or contract. A cooperative agreement may have elements of both grants and contracts.

Grant — A legally binding agreement with a corporation, foundation, or government to provide financial support for a specific program, project, or activity. A grant is awarded by an organization to further its mission and objectives. Grants are awarded as a form of encouragement, and require recipients to use their best efforts. Upon accepting a grant, the Smithsonian and the sponsor are legally obligated to comply with the award terms.

Grants are subject to one or more of the following requirements:

- The period of performance is specified by the sponsor.
- Any unspent funds are to be returned to the sponsor.
- Funds must be spent in accordance with an agreed-upon budget.
- Additional financial terms and conditions are specified by the sponsor.
- Financial reports must be provided to the sponsor.
- Deviations from stated grant terms require the sponsor's approval or notification to the sponsor.
- A research or performance report is required by the sponsor for evaluation purposes.

In order to comply with generally accepted accounting principles, grants are classified as either contribution or exchange transactions. Government awards are always classified as exchanges. Private awards are classified in consultation between OSP and the Office of Advancement (OA) as either contribution or exchange transactions, which are defined as follows:

Definitions
(continued)

- **Contribution Transaction** — For a contribution transaction, the sponsor imposes minimal conditions on fund use. Contribution revenues are recognized in full at the time of award.
- **Exchange Transaction** — For an exchange transaction, the sponsor imposes additional conditions on fund use and the funds are temporarily restricted. Exchange revenues are recognized only as project expenses are incurred.

Interagency Agreement (IAA) — A reimbursable agreement between two or more participants in an ongoing business relationship, including but not limited to: agreements between agencies, grant-related agreements, and assisted acquisitions. IAAs will consist of a document endorsed by representatives of the Smithsonian Institution and one or more federal agencies, which commits each party to certain responsibilities and will frequently include provisions for funding. See SD 319, *Incoming Interagency Agreements and Transfers*, for more information.

Interagency Transfer (IAT) — The transfer of federally appropriated funds between the Institution and an agency or agencies as required by an IAA. Funds collected through an interagency transfer are subject to the same controls as if the funds had been directly appropriated (see [SD 305](#), *Administrative Control of Funds*). Therefore, interagency transfers will be controlled by the same controls on appropriations which are outlined in SD 301, *Financial Management Accounting Practices and Procedures*, and SD 302, *Financial Management Payment Policies, Systems, and Procedures*. See SD 319, *Incoming Interagency Agreements and Transfers*, for more information.

Sponsored Project Contract — A legally binding agreement between the Smithsonian and another party. The agreement consists of promises made by each party, each of whom is legally obligated to fulfill its terms. A sponsored project contract can be entered into with a corporation, foundation, government, or other

Definitions
(continued)

entity to provide financial support for a specific program, project, or activity, in return for which the Smithsonian agrees to provide project results to the sponsor.

A sponsored-project contract is *not* donative in nature, but is a mutually beneficial arrangement by which the sponsor supports a project with the expectation of benefiting from its results. Most often, results are in the form of a research report or copies of publications. In some cases, results are tangible items, such as equipment or an exhibit, produced as a consequence of the activity. A sponsored project contract is defined, for accounting purposes, as an exchange transaction.

In the case of *sponsored projects* from government entities, the type of award — whether it is a grant, contract, or cooperative agreement — is determined by the government entity. An award from a government entity is defined, for accounting purposes, as an exchange transaction.

**Process to Accept
External Funding
Agreements**

A Smithsonian scholar should contact OSP or the Smithsonian Astrophysical Observatory (SAO) Sponsored Programs and Procurement Department (SPPD) prior to submitting a proposal to a sponsor (see SD 321, *Review and Submission of Proposals for Sponsored Projects*) or agreeing to perform any work for a sponsor. OSP or SAO-SPPD staff will:

- review the proposed budget and statement of work
- review a sponsor's proposed agreement and negotiate the terms and conditions of the agreement with the sponsor, in coordination with and with the approval of the principal investigator or project director
- obtain the appropriate signature on the agreement as described below

**Signature Authority
for Incoming Funds**

The contracting party for incoming funds from external sources is the Smithsonian Institution, not individuals or Smithsonian units. All grants, sponsored project contracts, cooperative agreements, and interagency transfers are signed in the name of the Smithsonian Institution.

The **Secretary of the Smithsonian Institution** has delegated, in writing, contracting authority to sign for and accept, on behalf of the Smithsonian, all incoming agreements and awards related to externally funded, government and non-government, grants, sponsored project contracts, cooperative agreements, and interagency agreements, to the following individuals:

- **Director, Office of Sponsored Projects (OSP)**, on behalf of the Smithsonian and units other than Smithsonian Astrophysical Observatory (SAO). For non-government awards, OSP consults with OA prior to signing any agreement.
- **Manager, Sponsored Programs and Procurement Department (SPPD), SAO**, on behalf of SAO.

**Signature Authority
for Outgoing Funds**

The contracting party for outgoing sub-award agreements funded from sponsored projects is the Smithsonian Institution, not individuals or Smithsonian units. All sub-awards are signed in the name of the Smithsonian Institution. A sub-award is an agreement with a third party, such as an educational institution, to participate in the project's scope of work, and the sub-awardee must abide by the terms and conditions of the sponsor and the Smithsonian. The scope of work and budget of the sub-award should be described in the proposal and therefore is approved by the sponsor. Sub-awards are created to fund the collaborative organizations that participate materially in the scope of work of the project (not for purchasing goods and services).

The **Director, OCon&PPM**, has delegated to the Director of Sponsored Projects and the Manager, Sponsored Programs and Procurement Department,

**Signature Authority
for Outgoing Funds**
(continued)

SAO, the authority to prepare, sign, and award all subcontracts or sub-awards wherein sponsored project funds are obligated. Individuals or Smithsonian units do not have authority to issue sub-awards obligating sponsored project award funds.

Hybrid Agreements

Occasionally, an external agreement will not fall into any of the categories defined here, or its complexity will place it in more than one type of category. To determine how to categorize such an agreement, OSP, OA, SE, SAO SPPD, and OCon&PPM designated staff will consult with the Office of General Counsel, if necessary.

**Summary Table
of Agreements
and Signature
Authority**

Agreement Type	Source of Funds	SI ERP* Fund Codes	Signature Authority
Incoming Funds			
Grant, cooperative agreement or sub-award passed through from another institution	Corporation, foundation, or other entity, whether for-profit or not	802	Director, OSP, or Manager, SPPD, SAO
	Federal, state, local, or other government	803	
Sponsored Project Contract, or sub-award passed through from another institution	Corporation, foundation, or other entity, whether for-profit or not	802	Director, OSP, or Manager, SPPD, SAO <i>(Table continued on page 8)</i>
	Federal, state, local, or other government	803	

* Enterprise Resource Planning System

**Summary Table
of Agreements
and Signature
Authority**
(continued)

Agreement Type	Source of Funds	SI ERP* Fund Codes	Signature Authority
Interagency Transfer	Federal appropriation	007, 119, or 127	Director, OSP, of Manager, SPPD, SAO
Outgoing Funds			
Sub-awards issued on grant/contract awards received by SI	Any of the above	802, 803, 007, 119, or 127	Director, OSP, or Manager, SPPD, SAO
* Enterprise Resource Planning System			

References

Please refer to the following resources for additional information:

- [SD 301, Financial Management Accounting Practices and Procedures](#) (available on Prism)
- [SD 304, Guidelines for Administering Indirect Cost \(Overhead\) Rates and Charges](#) (available on Prism)
- [SD 314, Contracting](#) (available on Prism)
- [SD 319, Incoming Interagency Agreements and Transfers](#) (available on Prism)
- [SD 321, Review and Submission of Proposals for Sponsored Projects](#) (available on Prism)
- [SD 809, Philanthropic Financial Support](#) (available on Prism)
- OSP's *Guide to Sponsored Projects* (available on [OSP's Prism website](#) under the "Submitting a Proposal" heading)

CANCELLATION:
INQUIRIES:
RETENTION:

SD 318, May 9, 2006
Office of Sponsored Projects (OSP)
Indefinite. Subject to review for currency 24 months from date of issue

INCOMING INTERAGENCY AGREEMENTS AND TRANSFERS

Background	1
Applicability	1
Definitions	2
Process to Accept an Interagency Transfer	2
Responsibilities	3
Indirect Costs	5

Background

As an organization classified under section 501 (c)(3) of the Internal Revenue Code, the Smithsonian Institution has the authority to enter into grants and contracts with federal agencies. Grants and contracts are the most preferred means for the Institution to receive funds from those agencies, because grants and contracts are the funding vehicles best suited to Smithsonian projects.

However, since the Smithsonian also is a federal entity that receives direct federal appropriated funds, under certain circumstances, the Institution will consider entering into interagency agreements (IAAs) that provide for the transfer of funds to the Smithsonian from a federal agency. The purpose of this Smithsonian Directive (SD) is to explain how such incoming transfers are handled.

Applicability

It should be noted that not all activity between agencies involves the transfer of funds and that there are many types of agreements which can exist between agencies other than IAAs. This Smithsonian Directive only addresses activities specifically known as IAAs, as defined below, and only those IAAs which involve the Smithsonian's receipt of money for sponsored project activity from one or more federal agencies. SD 318, *Externally Funded Sponsored Projects*, includes further discussion and definitions of sponsored projects.

Applicability
(continued)

Note that other kinds of IAAs are received by the Smithsonian for non-sponsored project activities or services, such as reimbursement for guard services, or for space or equipment rentals, and are administered by the Smithsonian unit receiving the funds, not by the Office of Sponsored Projects (OSP). These other types of IAAs are not covered by this SD, and, in such cases, all documentation is handled by the unit and coordinated with the Office of the Comptroller (OC).

IAAs which involve the Smithsonian transferring money to a federal agency are subject to SD 314, *Contracting* (and Part 4 — Procurement and Contracting Special Handling — of the *Procurement and Contracting Procedures Manual*).

Definitions

An ***Interagency Agreement*** is a reimbursable agreement between two or more participants in an ongoing business relationship, including, but not limited to, agreements between agencies and assisted acquisitions. IAAs will consist of a document signed by representatives of the Smithsonian Institution and one or more federal agencies, which commits each party to certain responsibilities and will frequently include provisions for funding.

An ***Interagency Transfer (IAT)*** is the transfer of federally appropriated funds between the Institution and an agency or agencies as required by an IAA. Funds collected through an interagency transfer are subject to the same controls as if the funds had been directly appropriated to the Smithsonian (see SD 305, *Administrative Control of Funds*). Therefore, the Smithsonian will manage interagency transfers with the same controls on appropriations which are outlined in SD 301, *Financial Management Accounting Policies and Procedures*, and SD 302, *Financial Management Payment Policies, Systems, and Procedures*.

**Process to Accept
an Interagency
Transfer**

A Smithsonian principal investigator (PI) should contact OSP prior to submitting a written proposal to a federal agency (see SD 321, *Review and Submission of Proposals for Sponsored Projects*) or agreeing to

**Process to Accept
an Interagency
Transfer** (continued)

perform any work for the agency. As part of its review of the proposed relationship, OSP staff will:

- 1) clarify with the agency why it is not awarding a grant or contract, and why an IAA funded by a transfer is the appropriate option;
- 2) confirm that the Smithsonian can fulfill the terms and conditions of the IAA in a manner consistent with appropriations law, which may include fiscal year limitations on the use of funding, including whether appropriated funds can be used across fiscal years; and
- 3) review the agency's proposed agreement, negotiate the terms and conditions of the agreement with the agency to ensure that specific terms and conditions can be met by the Smithsonian (SD 304 and SD 318), and obtain the appropriate signature on the agreement.

Responsibilities

In addition to the tasks described in the "Process" section above, **OSP** is responsible for:

- coordinating with the unit on the programmatic terms of the agreement
- approving, accepting and signing the agreement on behalf of the Under Secretary for Finance and Administration/Chief Financial Officer (USF&A/CFO)
- forwarding the approved agreement to the agency for final execution
- providing documentation, including a detailed budget; the interagency setup form; and a copy of the executed agreement to OC to establish spending authority to the unit
- preparing and sending financial reports and invoices if required by the sponsor, and sending copies of invoices to OC so that funds can be collected

Responsibilities
(continued)

through the Intragovernmental Payment and Collection (IPAC) system.

The **OC** is responsible for:

- processing the transfer of IPAC funds to the Smithsonian, according to the terms of the interagency agreement as directed by OSP
- establishing a designated code for the unit
- performing updates to designated codes as terms change with existing interagency agreements, such as no cost extensions, changes to the principal investigator, etc.
- recording indirect costs based on amounts determined by OSP, in compliance with SD 304
- recording of IPAC payments in Accounts Receivable
- closing out the designated code, which includes reduction of spending authority, return of excess advances to sponsoring agencies, and the deactivation of designated codes as requested by OSP

The **Smithsonian Principal Investigator** performing the work is responsible for:

- contacting OSP as soon as possible prior to submitting a proposal to an agency or agreeing to perform any work for the agency
- meeting the terms and conditions of the agreement under which the funds were transferred
- ensuring that obligations/expenditures are made for the purposes intended in the interagency agreement, and meeting the requirements of SD 305
- ensuring that expenses meet allowability standards according to the *Smithsonian Institution Guide to Sponsored Projects*.

Responsibilities
(continued)

Unit funds control officers at the unit performing the work are responsible for following the requirements of SD 302, which include:

- determining the availability of funds and limiting costs to prevent overexpenditures against their designated funds
- maintaining the organization's unit fund records
- ensuring that funds are used for their stipulated purposes
- informing and advising the organization's personnel of policies and procedures related to the payment process
- serving as the organization's principal liaison with OC
- performing monthly fund reconciliation and submitting a service request form to correct any discrepancies between unit records and the monthly Enterprise Resource Planning (ERP) financial reports to the Financial Analysis and Reporting Division (FAR), OC
- ensuring expenses meet the allowability standards according to the *Smithsonian Institution Guide to Sponsored Projects*.

Indirect Costs

Recovery of indirect costs on IAAs and IATs is covered in SD 304, *Guidelines for Administering Indirect Cost (Overhead) Rates and Charges*, which is available on Prism.

CANCELLATION:
INQUIRIES:
REFERENCES:

SD 319, October 25, 2006
Office of Sponsored Projects (OSP)
SD 301, Financial Management Accounting Policies and Procedures
SD 302, Financial Management Payment Policies, Systems, and Procedures
SD 304, Guidelines for Administering Indirect Cost (Overhead) Rates and Charges
SD 305, Administrative Control of Funds
SD 310, Financial Reporting and Risk Management Internal Controls

Smithsonian Directive 319,
5/2/13

REFERENCES
(continued):

SD 314, Contracting (and Part 4 of the *Procurement and Contracting Procedures Manual*)

SD 318, Externally Funded Sponsored Projects

SD 321, Review and Submission of Proposals for Sponsored Projects

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 320,

November 29, 2011

COST-SHARING DOCUMENTATION ON SPONSORED PROJECT GRANTS AND CONTRACTS

Background	1
Purpose	2
Policy	3
Definitions	3
Responsibilities	6
The Cost-Sharing Commitment	8
Criteria for Allowable Expenditures	9
Specific Expenses	10
Expenditures Not Eligible	11
Cost-Sharing on Private Awards	12
Reduction in Cost-Sharing	12
Cost-Sharing Reporting	13
References	13

Background

This directive refers to cost sharing on Government and private grants and contracts, as defined by Title 2, *Code of Federal Regulations* (CFR), Part 215 (“*Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations*”). Gifts, sponsorships, and in-kind contributions of goods or services to the Smithsonian are not covered by this directive.

The Smithsonian Institution occasionally supports sponsored projects through cost-sharing. Cost-sharing in this directive refers to that portion of total project expenses related to a sponsored project that is contributed by parties — the Smithsonian or a third party — other than the primary sponsor. Cost-sharing, also referred to as matching funds, may consist of cash contributions or donation of in-kind services by the Smithsonian. However, contribution of such Smithsonian resources to sponsored projects must be carefully considered; and, cost-sharing must be included in the proposal, approved in the award,

Background
(continued)

administered, and accounted for in a consistent and prudent manner. Once the Smithsonian has made a cost-sharing commitment that is accepted by the sponsor, it is important to document and memorialize the fulfillment of the responsibilities and to comply with a sponsor's requirements.

The scholarly work funded by external sponsors through grants or contracts requires the support of a significant amount of Smithsonian staff time and resources. To ensure that the full costs of successfully completing a project are captured in the grant or contract proposal request to a sponsor, Smithsonian scholars or Principal Investigators (PIs) are encouraged to consult with appropriate unit staff or the Office of Sponsored Projects (OSP) staff to accurately capture these anticipated Institutional expenses. All project costs necessary to support scholarly research, education or exhibits should be included, if possible, in proposal budgets, as they will improve the ability of the scholar and the Institution to successfully carry out the objectives of the project. When cost-sharing is required by a sponsor, scholars may be able to use Institutional costs that will not be funded by the sponsor as a cost-sharing contribution.

Purpose

This document presents the Smithsonian's policy and procedures on cost-sharing for sponsored grants and contracts. The policy was developed to:

- provide guidance on when the Smithsonian permits cost-sharing, including what kinds of services, expenditures, or assets may be used as cost-sharing
- provide information about the contractual, financial, and administrative implications that result from the commitment to cost share
- establish procedures for demonstrating to sponsors that the Smithsonian has fulfilled any cost-sharing commitments that it made as a condition of obtaining external sponsorship.

Policy

In general, the Smithsonian cost-shares in a sponsored project when required by law or regulation, or when specifically required by the sponsor, or when the unit desires to do so based upon its mission and plans. Typically, the extent of cost-sharing is the amount necessary to meet the specific requirements of the award. Smithsonian units should carefully consider all the ramifications of cost-sharing, analyzing the impact of cost-sharing on unit resources. All cost-sharing commitments must be documented and included in the OSP Proposal Brief and be approved by the director of the unit responsible for those funds.

Note that Smithsonian cost-sharing represents a redirection of Smithsonian resources and funds from other unit activities to support sponsored agreements and may affect the Institution's indirect cost rate. When the Smithsonian cost-shares, units may seek assistance from a third-party source (e.g., an external organization collaborating on the sponsored project) to satisfy the cost-share requirement before committing Smithsonian funds.

To avoid any misunderstanding among the parties involved, all cost-sharing commitments must be included in the OSP Proposal Brief and be approved by the director of the unit responsible for these funds.

Proposed cost-sharing in excess of \$100,000 also must be approved by the appropriate Under Secretary. Proposed cost-sharing in excess of \$1,000,000 also must be approved by the Secretary.

To ensure that this policy is implemented accurately and efficiently, the Smithsonian requires mandatory training for all principal investigators and fund managers responsible for projects involving cost-sharing requirements. This training is developed and provided by the OSP.

Definitions

Refer to SD 318, *Revenue-Generating, Externally Funded Financial Agreements*, for complete definitions of different types of agreements. In this directive, the following definitions (as taken from SD 318) apply:

Definitions
(continued)

Cost-sharing: Cost-sharing refers to that portion of total project expenses related to a sponsored project that is contributed by parties — the Institution or a third party — other than the primary sponsor. Cost-sharing can consist of cash contributions or donation of in-kind services.

Direct Cost: A cost that directly benefits and is specifically identified with a sponsored project or program.

Effort: Time spent by a principal investigator or other employee on a sponsored project or program.

Government Flow-through Grant or Contract: A grant or contract to the Smithsonian from a non-Government sponsor that either states that funding has been provided by a federal sponsor or incorporates federal award terms and conditions. Because Government flow-through grants and contracts require financial and administrative time and attention similar to what is required for Government awards, Government flow-through grants and contracts are treated as if they are awarded directly from a Government sponsor. (Please refer to the *OSP Guide to Sponsored Projects* for further details regarding types of awards.)

Grant: A grant is an agreement to provide financial assistance for a specific Smithsonian program, project, or activity. A grant is given as a form of support without expectation of project control or any beneficial return to the sponsor other than appropriate acknowledgment and recognition. Upon acceptance of a grant, the Smithsonian is legally obliged to comply with its terms. (A grant is distinguished from a gift based on the conditions imposed upon the Smithsonian by the granting sponsor, such as financial reporting or return of unspent funds. A grant differs from a contract in that there is no expectation of beneficial return to the sponsor.)

Indirect Cost (also referred to as Administrative Services/Project Oversight or “AS/PO” for private grants): Operational costs that are not directly incurred

Definitions
(continued)

as a result of a project or program. Indirect costs include, but are not limited to, central administrative, facility maintenance, and services such as accounting, human resources, grant proposal preparation, information technology needs, legal services, contract compliance, and financial reporting that provide support to sponsored projects. (In addition, indirect costs could also include project management if there is no assigned project manager.)

Sponsored Project: A program or project that receives full or partial funding through a grant, contract, or other mechanism from a source external to the Smithsonian. The type of sponsored project — grant, contract, or cooperative agreement — is determined by the Smithsonian's internal definitions.

Sponsored Project Contract: An agreement by a corporation, foundation, government, or other entity to provide financial support for a specific Smithsonian program, project, or activity, in return for which the Smithsonian agrees to provide project results to the sponsor. A sponsored project contract is a mutually beneficial arrangement by which the sponsor supports a Smithsonian project with the expectation of benefiting from the results of the project. The Smithsonian is required to deliver the results of the project to the sponsor. Most often, the results are in the form of a research report or copies of publications. In some cases, the results are tangible items produced as a consequence of Smithsonian research (e.g., a set of data). A sponsored project contract is an agreement consisting of promises made by each party, each of whom is legally obligated to fulfill all contractual terms. This may also include other types of contracts (e.g., consulting agreements).

Subaward: A formal legal arrangement in which an award is made by a primary institution to a participating institution. Agreements governing this relationship include expectations of work to be performed, milestones, deadline dates, budget, reporting requirements, and other programmatic or administrative terms and conditions.

Definitions
(continued)

Third-Party Contributions: These contributions may be either in-kind or cash contributions. “Third-party” refers to an organization other than the Smithsonian or the sponsor that is participating in the costs of the project. Third-party in-kind contributions may be equipment, supplies or other expendable property, goods and services, or real property that would directly benefit the project or program.

Responsibilities

The ***Office of Sponsored Projects:***

- reviews cost-sharing requirements and commitments during the pre-award stage and upon receipt of award;
- notifies units of cost-sharing requirements at time of award;
- incorporates appropriate cost-sharing conditions in subcontract agreements;
- works with unit administrators to determine appropriate reporting requirements;
- assists principal investigators and unit administrators in preparing agreements for third-party participation in a sponsored project;
- monitors cost-sharing requirements and works with the principal investigator to complete required cost-sharing reports;
- certifies cost-sharing reports to the sponsor; and
- provides training on cost-sharing for principal investigators and unit administrators.

The ***principal investigator:***

- determines the cost-sharing requirements of the project at the time of proposal submission, with assistance from the unit fund manager;

Responsibilities
(continued)

- evaluates the workload implications of proposed cost-sharing, with assistance from the unit fund manager;
- secures all required approval signatures for proposed cost-sharing commitments; and
- attends training on cost-sharing provided by OSP.

The ***unit fund manager***:

- provides OSP with a completed cost-sharing authorization form at the time of award, with guidance from the principal investigator on the costs that must be reported;
- adjusts the employee effort distribution to reflect cost-sharing commitments or changes to cost-shared effort, when appropriate, with guidance from the principal investigator;
- identifies, quantifies, and records the cost-sharing commitment, and retains cost-sharing records in the unit, with guidance from the principal investigator;
- submits periodic cost-sharing reports to OSP that comply with the sponsor's reporting requirements, with guidance from the principal investigator; and
- attends training on cost-sharing provided by OSP.

The ***unit director*** approves any cost-sharing commitments included in proposals.

The ***appropriate Under Secretary*** approves cost-sharing commitments in excess of \$100,000. For the purpose of this directive, "Under Secretary" includes related positions with similar authority, such as assistant secretary or deputy under secretary.

The ***Secretary*** approves cost-sharing commitments in excess of \$1,000,000.

The Cost-Sharing Commitment

Whenever the Smithsonian agrees to pay a portion of the allowable costs of a sponsored project, the Smithsonian has made a cost-sharing commitment.

Cost-sharing has a significant financial impact on the unit providing the funds, and on the Smithsonian as a whole. When a principal investigator proposes, and the Smithsonian agrees, to cost-share a project, the Smithsonian is obligated to provide the resources they have committed to for the performance of the sponsored agreement. Considering the administrative requirements and responsibilities inherent in the cost-sharing commitment, the principal investigator and unit administrator should weigh the cost-effectiveness and the expected benefits of each cost-sharing commitment before making these commitments.

Implicit in the Smithsonian's commitment to cost-share is the project director or principal investigator's agreement to ensure that:

- funds are provided for cost-shared direct costs;
- the cost-sharing commitment is documented when the proposal is submitted. Where applicable, the documentation should include a written agreement with any third parties that reflects their commitment to participate in the project, as well as their level of monetary contribution to the project. OSP will assist principal investigators in drafting such agreements;
- the Cost-Sharing Authorization Form (available through OSP) with attached budget, indicating the source of cost-sharing funds or a guarantee account, is completed upon receipt of the award and submitted to OSP;
- allowable costs are promptly and accurately charged to the appropriate cost-sharing account;
- expenditures on cost-sharing accounts are certified. Third-party contributions must be certified by that organization's chief financial officer (CFO) or designee;

**The Cost-Sharing
Commitment**
(continued)

- records for cost-sharing accounts are retained for the same period as the records for related sponsored agreements. Monitoring, reporting, and certifying expenditures used for cost-sharing are subject to internal as well as external audits; and
- cost-sharing items are not reported more than once.

Noncompliance with cost-sharing commitments has serious implications for the Smithsonian. After the award is accepted, failure to comply with the cost-sharing commitment may result in a loss or return of project funds.

**Criteria for Allowable
Expenditures in
Cost-Sharing on U.S.
Government-Funded
Sponsored Projects**

In accordance with Title 2, CFR, Part 215, all contributions, including cash and third-party, in-kind contributions, shall be accepted as part of the Smithsonian's cost-sharing on federal awards when such contributions meet all of the following criteria. Many, but not all, of these criteria apply to cost-sharing on privately funded projects.

The contributions must:

- be certifiable from the recipient's records;
- not be included as contributions for any other federally assisted project or program;
- be necessary and reasonable for proper and efficient accomplishment of the project or program objectives;
- be allowable under the applicable cost principles. The applicable cost principles that apply to the Smithsonian are contained in Title 2, CFR, Part 230. (Other types of organizations, such as universities, follow different sets of cost principles);
- not be paid by the federal Government under another award, except where authorized by federal statute to be used for cost-sharing;

Criteria for Allowable Expenditures in Cost-Sharing on U.S. Government-Funded Sponsored Projects
(continued)

- be provided for in the approved budget when required by the sponsor; and
 - be consistent with other provisions of Title 2, CFR, Part 215, as applicable.
-

Specific Expenses that May Be Considered for Cost-Sharing on U.S. Government-Funded Sponsored Projects

The principal investigator is responsible for identifying and providing resources for cost-sharing of direct costs. On U.S. Government-funded awards, the principal investigator may not use funds from another federal award as the source of cost-sharing, except as authorized by statute. For federally funded sponsored projects, the Smithsonian's primary source of funds for cost-shared expenditures is trust funds.

Cost-sharing may consist of either direct, or, in some instances with sponsor approval, unrecovered indirect expenses, which result when indirect costs are waived or their rate is reduced. When direct expenses are cost-shared, the applicable indirect cost rate is automatically cost-shared. Examples of allowable forms of cost-sharing are:

- the effort of any trust employee devoted to a sponsored project, including the associated fringe-benefit costs;
- the cost of any equipment purchased which is necessary for, and dedicated to, the successful completion of the project. Principal investigators should take care in preparing proposals for sponsored agreements not to commit the use of Smithsonian-owned or Government-owned equipment as cost-sharing, but rather to characterize the equipment as "available for the performance of the sponsored agreement at no direct cost to the project";
- costs for laboratory supplies;
- costs for travel;

**Specific Expenses
that May Be
Considered for Cost-
Sharing on U.S.
Government-Funded
Sponsored Projects**
(continued)

- costs incurred by subcontractors or other third parties, including third-party, in-kind contributions, not otherwise reimbursed. The value of a third-party, in-kind contribution must be established. Valuation criteria for U.S. Government-funded sponsored projects are in Title 2, CFR, Part 215. When the contribution is in the form of personal services, the contributor must certify that the amount cost-shared is comparable to the individual's regular rate of compensation. When contributions are other than personal services, the provider must state the fair-market value of the item; and
- waived or reduced indirect costs — the difference between the applicable, negotiated, indirect cost rate and the amount of indirect costs awarded by the sponsor.

Central administrative, facility, and service expenses (indirect costs) are real costs of conducting sponsored programs. They do not cease to exist simply because a sponsor refuses to pay for them. The Institution must fund all of those allowable costs not reimbursed by program sponsors. When direct costs are cost-shared, the indirect costs associated with the direct costs are automatically cost-shared. Principal investigators may include these costs in the proposal budget.

**Expenditures Not
Eligible in Cost-
Sharing on U.S.
Government-Funded
Sponsored Projects**

The costs must *not* be:

- part of the Smithsonian's annual federal appropriation;
- included as cost-sharing for any other U.S. Government-funded sponsored project;
- payable by the same sponsoring agency under another award;
- funds obtained from another federal grant or contract;

Expenditures Not Eligible in Cost-Sharing on U.S. Government-Funded Sponsored Projects
(continued)

- unallowable costs as defined in Title 2, CFR, Part 230;
- salary dollars above a regulatory cap; or
- Smithsonian facilities such as laboratory space.

Principal investigators should take care in preparing proposals for sponsored agreements not to commit use of facilities as cost-sharing, but rather to characterize the facilities as “available for the performance of the sponsored agreement at no direct cost to the project.”

Cost-Sharing on Private Awards

For sponsored project grant and contract awards from private sponsors, the allowable cost-sharing expenditures are subject to the sponsor’s written guidelines, direct negotiations with the sponsor, and the terms and conditions of the grant or contract award document. Title 2, CFR, Part 215 does not apply to privately funded sponsored projects. A private sponsor may elect to allow expenditures in cost-sharing that are not allowable for Government-funded sponsored projects, such as the value of federal employee time and effort, expenses paid with federal funds, and expenses incurred outside the performance period of the award.

Reduction in Cost-Sharing

The actual effort and other costs required to accomplish the goals of a sponsored project might differ from what was proposed and awarded. The total costs could decrease due to changes in project needs. When there is cost-sharing on such projects, the sponsor may need to be consulted to determine if the reduction should be applied to the Institution’s amount of cost-sharing only, or to both sponsor and Institution contributions proportionately. Otherwise, the sponsor’s share is reduced and the Institution’s entire cost-sharing commitment must be met. The principal investigator or appropriate unit administrator must consult with the OSP before the sponsor is contacted.

**Cost-Sharing
Reporting**

The Smithsonian is responsible for providing information required by sponsors to demonstrate that the Smithsonian has fulfilled the cost-sharing commitments that it made as a condition of receiving external sponsorship. The Office of Sponsored Projects is responsible for certifying the cost-sharing reports when required by the sponsor. The unit receiving the award must provide the necessary information on the Cost-Sharing Authorization Form at the time of the award, and complete and submit to OSP annually — or more frequently if required by the sponsor — the applicable Cost-Sharing Reporting Form (available from OSP). Principal investigators and fund managers administering projects that require documentation and certification of cost-sharing are required to complete mandatory training on proper procedures.

References

- SD 304, *Guidelines for Administering Indirect Cost (Overhead) Rates and Charges*
 - SD 318, *Revenue-Generating, Externally Funded Financial Agreements*
 - SD 321, *Review and Submission of Proposals for Sponsored Projects*
 - SD 809, *Private Financial Support*
 - *OSP Guide to Sponsored Projects* (“PI Guide”)
-

CANCELLATION:
INQUIRIES:
RETENTION:

SD 320, May 23, 2001
Office of Sponsored Projects (OSP)
Indefinite. Subject to review for currency 24 months from date of issue



SMITHSONIAN DIRECTIVE 321,

February 10, 2005,
Date Last Declared Current: June 24, 2010

REVIEW AND SUBMISSION OF PROPOSALS FOR SPONSORED PROJECTS

Background	1
Applicability	1
Purpose	2
Policy	3
Definitions	3
Review Cycle	7
Proposals Involving Policy Exceptions	9
Rights and Safeguards	9
Coordination with Other SI Offices	10
Additional Guidelines	11

Background

Sponsored projects are an integral component of the Smithsonian's mission and account for a significant portion of the Institution's revenues each year. The large number of sponsored projects that is supported by government, industry, and foundation sources brings with it a myriad of ever changing legal, financial, and administrative requirements with which the Smithsonian must comply. Due to the complexity of conditions involved in the administration of sponsored projects, plus a trend toward greater diversity in sources of support, it is essential that all proposals for sponsored project activities be reviewed centrally prior to submission to the sponsor. This review will ensure compliance with sponsor regulations and Institutional policies.

Applicability

This directive is applicable to all proposals submitted to government or non-government organizations (not individuals) that may result in a grant or contract award. These types of awards usually require submission to

Applicability
(continued)

the sponsor of a detailed budget, as well as certified financial reports on how the funds have been spent.

This policy does not cover the submission of requests that will be awarded as gifts or bequests to or corporate sponsorships with the Institution (see section below entitled “Coordination with other SI Offices”). In addition, this policy is not applicable to the Smithsonian Astrophysical Observatory (SAO), which has its own procedures for review and submission of proposals for sponsored projects.

Purpose

This directive presents Smithsonian policy and procedures related to seeking financial support from external sources for sponsored projects for research, education, exhibitions, and other related activities. This policy is necessary to ensure that all research and other externally funded sponsored projects conducted by Smithsonian employees, or with the use of Smithsonian resources or facilities, are approved by the appropriate offices and comply with relevant Institutional policies and guidelines, including those governing:

- integrity in research;
- appropriateness of the activity to the mission of the Institution;
- protection of human and animal subjects and the environment;
- use of Smithsonian facilities;
- adherence to personnel policies;
- compensation plans;
- intellectual property;
- conflicts of interest;
- recovery of direct and indirect costs; and
- liability insurance and indemnification.

Policy

It is the policy of the Smithsonian Institution that employees, research associates, or other authorized collaborators who receive any part of their salary through the Institution, and/or whose sponsored project activities use any Institutional resources or facilities, must submit their proposals for extramural support through the Office of Sponsored Projects (OSP).

The Secretary has delegated to OSP the authority and responsibility to assist principal investigators and project directors with the development and submission of proposals for externally-funded projects and the acceptance and administration of such awards. Because proposals are submitted on behalf of and awards are made to the Institution, not the principal investigator directly, organizational approval is required by sponsors. The sponsor expects the Institution to assume managerial and administrative responsibilities associated with the project.

An internal review and routing procedure has been established by OSP to ensure that each proposal or application for a sponsored project has been reviewed and endorsed by the responsible Smithsonian officials and that there is compliance with both sponsor and Institution policies.

Definitions

Proposal is a formal statement of a project for which external support is sought. There are many types of proposals such as the following examples:

- Letters of intent, white papers, and other forms of preliminary proposals provide, at most, an overview of the proposed project. Many sponsors do not require detailed work plans at this stage of the process, but they may use these initial descriptions as the basis for decisions on whether to request a full proposal.

Definitions
(continued)

- Full proposals provide a complete description of the proposed project, including a detailed budget, project plans, and staff and Institutional information.
- Revisions of elements of proposals and/or budgets respond to requests by prospective sponsors prior to making a funding decision.

While a proposal may take several forms, as illustrated above, in general a proposal will:

- be initiated from a disciplinary or educational perspective;
- be characterized by a statement of need or purpose with a finite set of goals or objectives;
- include the development of a product, usually a technical report;
- request a specific sum of money, usually presented in a detailed budget, for accomplishing the project.

Principal Investigator/Project Director is the Smithsonian federal or trust staff member or research associate responsible for the technical and budgetary design of projects proposed for funding by external sponsors. The principal investigator must be knowledgeable about both sponsor and SI guidelines and policies related to proposal preparation and must prepare proposals according to those guidelines.

Corporate Sponsorship is the relationship between the Smithsonian and a corporation or organization other than an individual that involves financial support of an exhibition or program. This may be philanthropic or may involve the extension to the sponsor of benefits other than recognition.

Definitions
(continued)

Sponsored Project is a research, education, public outreach, collections-related, exhibition-related, or other project supported by external funds that are received by the Institution on behalf of an Institution member, and for which the Institution is accountable. Such funds are provided as a result of a formal communication with the sponsor such as a letter, application, or other written proposal signed and submitted by the Director, OSP, the Institution's authorized representative. A sponsored project always will require some use of Institutional resources and the sponsor will receive some benefit. A sponsored project normally will have one or more of the following additional characteristics in accordance with SD 318, *Externally Funded Grants and Sponsored-Project Contracts*:

- the sponsor has published guidelines, applications, and/or procedures for requesting support;
- the use of awarded funds is restricted to support for a particular project;
- the award includes specifications for project performance and/or outcomes;
- the award provides for disposition of rights-in-data, inventions, and/or other intellectual property;
- the sponsor requires, as a condition of the award, programmatic, technical, and/or financial reports. Note: all financial reports are subject to external audit.

Awards given in response to sponsored project proposals may take various forms. Several examples include:

- **Grant** is donative in nature and given as a form of encouragement without expectation of project control or any beneficial return to the sponsor other than appropriate acknowledgment and recognition. Upon acceptance of a grant, the Smithsonian is legally obliged to comply with its terms.

Definitions
(continued)

- **Cooperative Agreement** is similar to a grant, but has statutory criteria that anticipates substantial involvement or collaboration with the sponsor during the performance of the award.
- **Sponsored Project Contract** is an agreement with a corporation, foundation, government, or other entity to provide financial support for a specific Smithsonian program, project, or activity, in return for which the Smithsonian agrees to provide specific project results to the sponsor. A sponsored project contract is not donative in nature, but rather is a mutually beneficial arrangement by which the sponsor supports a Smithsonian project with the expectation of benefiting from the results of the project.
- **Subcontract** is a formal arrangement, like a contract, in which an award is made by a prime institution to a participating (second-tier) institution. Agreements governing this relationship include expectations of work to be performed, deadline dates, budget and reporting requirements, and other administrative conditions. One particular example of a subcontract is a government flow-through grant or contract which is an award to the Smithsonian from a sponsor that states funding has been provided by a federal sponsor and/or incorporates federal award terms and conditions.
- **Purchase Order** is a legal document that constitutes a contract between the sponsor and the Smithsonian. The document must contain all pertinent details of the agreement.

Definitions
(continued)

- **Interagency Agreement** is the direct transfer of funds from one federal government agency to another. OSP administers these sponsored projects, even though these funds are classified as federal funds and not as trust funds. The Office of the Comptroller conducts the financial administration of these agreements (see SD 319, *Interagency Transfers*).
-

Review Cycle

The primary persons and offices involved in the internal review and processing of sponsored project proposals are as follows:

- The **Principal Investigator (PI)** is responsible for the budget, technical content, quality, and preparation of the proposal presenting his or her ideas for a project. The PI will confirm that he or she may approach the prospective funder by coordinating with the unit development officer (or with the manager of Prospect Development in OD if there is not a unit development office).
- The PI's **supervisor** is responsible for approving the project, which includes confirming the compatibility of the project with the PI's other commitments, the availability of space and facilities, cost-sharing commitments, assuring that the project is in keeping with the unit's mission and objectives, and concurring that the proposal should be submitted to the identified sponsor.
- **Museum, research center and office directors** are accountable for all funds administered by departments under their control, as well as for programmatic coordination of their units. They are responsible for approval of all cost-sharing commitments (including those of any third party) included in proposals from their units, and for assuring that all proposals are consistent with the objectives of their units.

Review Cycle
(continued)

- The **Director, OSP**, is responsible for reviewing and approving the business plans of proposals, and submitting all proposals for sponsored projects to the potential funders. OSP assures compliance and consistency of proposals with sponsor and Institutional guidelines and policies, provides necessary Institutional signatures and certifications, and officially transmits proposals to sponsor agencies on behalf of the Institution. OSP also is responsible for reviewing matters and coordination with appropriate Institutional committees regarding projects involving human subjects, the experimental use of animals, DNA research, third-party contributions, and related concerns. Concurrently, issues of Institutional financing, cost sharing, prior acceptance of contractual terms, required committee reviews, and budget matters are resolved by OSP.

To document approval of each proposal for a sponsored project, the proposal must be accompanied by an OSP *Proposal Brief*. This form, generated by OSP, must have the appropriate Institutional approval signatures before the proposal will be submitted by OSP to the potential sponsor. This includes proposals which are submitted electronically (see below). Complete proposals and the *Proposal Brief* proceed from the principal investigator to the supervisor, to the unit director, and then to OSP. When the proposed activity involves multiple units, each principal investigator, supervisor, and unit director must sign the *Proposal Brief*.

Paper Submission: When all required signatures on the *Proposal Brief* have been obtained, OSP will sign the proposal on behalf of the Smithsonian and prepare and attach a transmittal letter. This standard transmittal letter refers the sponsor to the principal investigator for technical or programmatic matters and to OSP for administrative, legal or financial matters.

Review Cycle
(continued)

Electronic Submission: Since sponsors that offer or mandate electronic submission of proposals have their own individual systems, specifics of submission protocols will vary. Typically, the principal investigator electronically submits the proposal to OSP. Upon review, OSP then approves the proposal and electronically submits the proposal to the sponsor.

**Proposals Involving
Policy Exceptions**

Proposals that involve exceptions to Institutional policy will require additional, specific approvals in addition to those routinely required for submission of sponsored project proposals. Examples of exceptions include:

- a request for a waiver or reduction in applicable indirect costs (see SD 304, *Guidelines for Administering Indirect Cost (Overhead) Rates and Charges*);
 - voluntary cost sharing for a project (see SD 320, *Cost-Sharing on U.S. Government Funded Sponsored Projects*);
 - acceptance of an interagency agreement as the award mechanism (see SD 319, *Interagency Transfers*);
 - establishment of an advance fund account pending receipt of a formal award document (see SD 308, *Advances and Investments in Trust-Funded Programs*).
-

**Rights and
Safeguards**

Proposals for the following activities require the approval of the research/technical protocol by the appropriate review committee. These committees assure the Institution's compliance with applicable regulations in these areas. Questions should be directed to OSP.

**Rights and
Safeguards**
(continued)

- laboratory animals (cognizant Institutional Animal Care and Use Committee or “IACUC”);
- radiological hazards (Office of Safety and Environmental Management);
- biohazardous agents, including recombinant DNA (Office of Safety and Environmental Management);
- scuba diving activities (Scientific Diving Office);
- human subjects (Institutional Review Board for the Protection of Human Subjects or “IRB”).

**Coordination with
Other SI Offices**

OSP maintains relationships and consults with many other Smithsonian offices as appropriate. These offices include the Office of the Comptroller, Office of Contracting, Office of Development, Office of External Affairs, Office of Fellowships, Office of the General Counsel, Office of the Inspector General, and Office of the Treasurer.

In addition to proposals for sponsored projects, requests are made to individuals and organizations for funds that are awarded to the Institution in the form of gifts, charitable contributions, or corporate sponsorships. These contributions, gifts, and corporate sponsorships are not processed through OSP; rather they are the purview of the Office of Development (OD) and the Office of External Affairs (OEA). In view of this distinction, OSP’s coordination with OD and OEA is of particular importance.

**Coordination with
Other SI Offices**
(continued)

The Smithsonian follows special procedures when submitting proposals to selected foundations, and both OSP and OD can assist staff in identifying private foundations and other potential sponsors whose areas of funding interest may match those of staff. Before submitting proposals to prospective funders, principal investigators must make contact with and obtain clearance from their unit's development office (or from the manager of Prospect Development in OD if there is not a unit development office). This clearance must be obtained before submitting a proposal to a private organization for award of a gift, grant, contract, or any type of charitable donation.

In many cases, it is uncertain at the time of submission of the proposal whether the award will be made in the form of a gift or a grant. Therefore, the PI or unit development officer is required to forward a copy of the submitted proposal to OSP when a detailed proposal budget is required by the sponsor, and when a potential award may be given by the sponsor in the form of a grant.

**Additional
Guidelines**

Detailed guidelines for submitting proposals are contained in OSP's *Principal Investigators Guide*, which can be downloaded from the OSP website.

CANCELLATION:

None

INQUIRIES:

Office of Sponsored Projects

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue

CHARGE CARD PROGRAM

Introduction	1
Background	1
Policy	2
Authorities and Responsibilities	3
Applicability	5

Introduction

This directive sets forth general policy regarding the application for, issuance, and use of Government-sponsored Travel Cards, Purchase Cards, and Fleet Cards (collectively, Charge Cards) by the Smithsonian Institution (SI).

Background

The Smithsonian Institution participates in a Government-wide contract (commonly referred to as SmartPay2) with the General Services Administration (GSA). The SmartPay2 contract facilitates the issuance of charge cards for use by agencies in support of their procurement activities.

Government charge cards assist the Smithsonian with minimizing the administrative burdens on units and central administration associated with processing cash advances, miscellaneous reimbursement requests, and issuing and tracking purchase orders that would be required if purchase cards were not available.

The procedures for implementing the general policy cited herein, and methods for overseeing and assessing policy compliance, are included in the following charge card program desk references issued as addenda to this directive:

- *Part 1 — Travel Card Program Desk Reference* — sets forth the procedures for application for, and issuance, assignment and proper use of Government travel cards issued to SI employees.

Background
(continued)

- Part 2 — *Purchase Card Program Desk Reference (Purchase Cardholder and Approving Official Training)* — sets forth requirements for becoming a Cardholder and/or an Approving Official and the roles and responsibilities of each.
- Part 3 — *Fleet Cards* — sets forth the procedures for management and proper use of Fleet Cards for purchasing fuel and maintenance and repair services for SI-owned or leased motor vehicles, including boats, aircraft and other motorized equipment.

Each desk reference includes information on administrative actions that may be taken for misuse or abuse of Charge Cards.

Policy

The Smithsonian Institution shall make available to units and qualified employees, through the contracted charge card provider, three types of Charge Cards for necessary expenses associated with conducting SI business:

- **Travel Cards** shall be requested for and issued to SI employees required to travel to perform their official duties and responsibilities. Travel cardholders shall use their assigned Travel Cards to pay for transportation services, lodgings, meals, vehicle rentals, and other allowable and authorized expenses incurred on official Smithsonian business.
- **Purchase Cards** shall be requested for and issued to employees who are qualified and designated by their unit directors to purchase required goods and services for their respective units for which use of a Purchase Card is authorized.
- **Fleet Cards** shall be requested, received, and controlled by the Transportation Branch Manager, Office of Facilities Management and Reliability (OFMR). Fleet Cards shall be used to pay expenses associated with operating and maintaining a particular vehicle that is owned or leased by the

Policy (continued)

Smithsonian Institution. Individual operators of such motor vehicles shall use the vehicle Fleet Card only at fueling and service locations directed by the Transportation Branch Manager.

At no time may a Charge Card be used for personal benefit of Cardholders or other individuals. Such use constitutes misuse and abuse of charge cards and non-compliance with *SD 103, SI Standards of Conduct*, and *SD 323, SI Spending Policy for Federal Appropriations and Trust Funds*, and its accompanying *Use of Funds Handbook*, and will be subject to penalties in accordance with applicable Smithsonian policies and procedures.

**Authorities
and Responsibilities**

**Office of Contracting and Personal Property
Management (OCon&PPM)**

The Director, OCon&PPM, as the SI principal Contracting Officer, is responsible for oversight of activities for procuring goods and services, including the Charge Card Program. The Director, OCon&PPM, has delegated the authority and responsibility for day-to-day management and oversight of the Charge Card Program to the Charge Card Program Branch Manager in OCon&PPM.

The Charge Card Program Branch Manager is responsible for establishing, maintaining and promulgating SI-wide Travel Card and Purchase Card policies and procedures, including ensuring that required training is available for employees to be issued a Travel Card or Purchase Card. The Charge Card Program Branch Manager is authorized to grant exceptions to the policies and procedures on a case-by-case basis.

The Charge Card Program Manager reviews expenses charged to the travel and purchase cards, and conducts on-site reviews to confirm compliance with Purchase Card policies and procedures by Purchase Cardholders and Approving Officials. To resolve questions of compliance, the Charge Card Program Manager may

**Authorities
and Responsibilities**
(continued)

request Purchase Cardholders to submit information that supports reviewed charges to the Charge Card Program staff.

Applications for new Travel Cards and Purchase Cards to be issued to eligible and qualified staff are reviewed for completeness by the Charge Card Program staff prior to being submitted to the Charge Card provider.

Transportation Branch Manager

The Transportation Branch Manager in OFMR is responsible for establishing, maintaining and promulgating the SI-wide policies and procedures for receiving and assigning use of Fleet Cards and oversight of compliance with the policies and procedures.

**Directors of Museums, Research Centers, and
Offices (Unit Directors)**

Unit directors are responsible for requesting Travel Cards for eligible employees and nominating qualified employees to be Purchase Cardholders and Approving Officials. Unit directors are also responsible for ensuring that employees in their organization who participate at any level of procurement and contracting processes, and those delegated contracting authority, maintain the integrity, effectiveness and efficiency of contract actions they initiate, and carry them out in a manner consistent with applicable Smithsonian directives and the *Procurement and Contracting Procedures Manual*.

Purchase Card Approving Officials

SI employees assigned Charge Cards, and/or responsibility for overseeing use of unit Charge Cards, must ensure the cards are stored in a secure location when not needed and that account numbers are protected and not shared at any time.

**Authorities
and Responsibilities**
(continued)

Cardholders

Cardholders must assure that each Charge Card is used properly and only for official authorized purposes as defined by the relevant policy and procedures (Travel, Purchase, or Fleet). All employees should report instances of suspected misuse and/or abuse of Charge Cards immediately to the Charge Card Program Manager or the Office of the Inspector General (OIG). Travel Cardholders are responsible for ensuring that all authorized travel expenses are submitted on properly completed travel vouchers to enable reimbursements and payment in full of the monthly charge card provider statements.

When applicable, Cardholders shall submit required payments or lodge disputes to the Charge Card provider by specified due dates. Cardholders shall also submit authorized repayment vouchers to the Office of the Comptroller (OC) in a timely manner.

**Travel Management Office (TMO), Office of the
Comptroller (OC)**

The TMO in OC is responsible for maintaining and promoting the SI-wide policies and procedures on all aspects of official temporary duty travel at the Smithsonian. The TMO oversees the use of centrally billed charge card accounts for transportation tickets purchased, and records travel authorizations, cash advances, and travel vouchers in SI official financial records.

Applicability

The policy and procedural information included in this directive and the Desk References issued as addenda (Parts 1–3) apply to all Smithsonian museums, research centers, programmatic centers, and offices, including Smithsonian Enterprises, the Office of the Regents, Office of the Secretary, and the OIG.

**CANCELLATION:
INQUIRIES:**

Not applicable.
Office of Contracting and Personal Property Management (OCon&PPM), Charge Card Program Branch

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue

SD 322, Charge Card Program

Desk Reference

Part 1 — Travel Card Program



Smithsonian Institution

**Office of the Under Secretary for Finance
and Administration/Chief Financial Officer
Office of Contracting
and Personal Property Management**

WHERE TO GO FOR HELP

Office of Contracting & Personal Property Management (OCon&PPM)

Travel Card Program

Enrollment, Charge Card Disputes,
Account Inquiries, GSA On-Line Training

OCon&PPM Prism Website <http://prism.si.edu/ocfo/ocon/ocon.htm>
OCon&PPM Help Desk (202) 633-7410
OCon&PPM Help Desk Email OConHelp@si.edu
OCon&PPM Help Desk Fax (202) 633-7319
Interoffice Mail CCP, OCon&PPM, CC 350, MRC 1200
Charge Card Program Manager (202) 633-1739
Charge Card Program Staff Vincent Shippy (202) 633-1737
Nikki Spencer (202) 633-7296

Travel Card Program and Cardholder Resources

OCon&PPM Prism Website http://prism.si.edu/ocfo/ocon/ocon_forms.htm
(Under *Travel Cards*)

- JPMC Travel Card Application w/ Individually Billed Agreement (IBA)
- Instructions for Completing JPMC IBA Travel Card Application
- JPMC Online Account Review and Payment Procedures

Travel Card Training <https://training.smartpay.gsa.gov/>
(General Services Administration)

Office of the Comptroller (OC)

Accounting Information (Chartfields)

Travel Management Help Desk (202) 633-8600
Travel Management Help Desk Email TMOHelpDesk@si.edu
GovTrip <https://govtrip.com/govtrip/site/index.jsp>
Accounts Payable Help Desk Email APHelp@si.edu
Travel Management Prism Website:.. <http://prism2.si.edu/Support/Travel/Pages/Home.aspx>
Travel Handbook http://prism.si.edu/ocfo/oc/docs/Travel_Handbook_version_2.2.1.pdf

JPMorgan Chase (JPMC)

Cardholder Inquiries and Customer Service Toll Free: (888) 297-0781
Collect: (847) 488-4442

Office of the Inspector General (OIG)

Main OIG Phone Number (202) 633-7050

TRAVEL CARD PROGRAM

TABLE OF CONTENTS

WHERE TO GO FOR HELP

CHAPTER 1.0	Introduction and General Information	4
1.1	Travel Card Program Management	4
1.2	Mandatory Use of Travel Cards	4
1.2.1	Benefits of Using a Travel Card	5
1.2.2	Cardholder Rights and Protections	6
1.3	Cardholder Responsibilities	6
1.4	Exceptions/Exemptions to Application for and Use of Travel Cards	7
CHAPTER 2.0	Applying for and Receiving Travel Cards	8
2.1	Training and Application for Travel Cards	8
2.1.1	Pre-Application Training	8
2.1.2	Applications	8
2.1.3	Submitting Travel Card Applications	9
2.2	Receipt of a Travel Card and Card Activation	9
2.3	Travel Card Spending Limits	9
CHAPTER 3.0	Proper Use of Travel Cards	10
3.1	Supportive Smithsonian Directives	10
3.1.1	Smithsonian Directive 103, Standards of Conduct	10
3.1.2	Smithsonian Directive 323, Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds	10
3.2	Authorized and Unauthorized Use of Travel Cards	10
3.2.1	<i>AUTHORIZED</i> Use of SI Travel Cards on Official Travel	10
3.2.2	<i>UNAUTHORIZED</i> Use of SI Travel Cards	11
3.3	Travel Authorization Procedures	11
3.3.1	Travel Authorization via the SI Automated Travel System (currently GovTrip)	11
3.3.2	Common Carrier Ticket Charges	11
3.3.3	Cash Advances	12
CHAPTER 4.0	Travel Card Security	13
4.1	Disclosure of Account Numbers	13
4.2	Lost, Stolen and/or Emergency Card Replacement	13
4.3	Surrendering Travel Cards	13
4.3.1	Departing Employees	13
4.3.2	Transferring Employees	14
4.4	Expired Travel Card Replacement	14
4.5	Travel Cardholder Recertification	14
CHAPTER 5.0	Reimbursement for Travel Card Charges	15
5.1	Travel Vouchers	15
5.2	ATM Transaction Fees	15

5.3	Canceled Trips	15
CHAPTER 6.0	Travel Card Account Management and Payments	16
6.1	Individually Billed Accounts	16
6.1.1	Monthly Reconciliation	16
6.1.2	Payment of Valid Charges	16
6.1.3	Past Due and Delinquent Travel Card Accounts	17
6.2	Smithsonian Centrally Billed Travel Card Account	17
6.3	Disputed Charges	17
6.3.1	Merchant Service and Delivery Issues	18
6.3.2	Billing Errors	18
6.4	Cardholder Inquiries	18
CHAPTER 7.0	Management Oversight and Corrective Actions	19
7.1	Policies and Procedures	19
7.2	Internal Controls	19
7.3	Compliance Assessment Methodology	20
7.4	Compliance Reports	20
7.5	Misuse and/or Abuse Corrective Actions	21
TABLE 322-1-1	Travel Card Misuse and Abuse: Table of Management Actions	22

CHAPTER 1.0 Introduction and General Information

Part 1 of the Charge Card Program Desk Reference expands on the general policy cited in *Smithsonian Directive (SD) 322, Charge Card Program*. The information and procedures herein pertain to applying for, proper use, and management oversight of the government Travel Cards assigned to Smithsonian Institution (SI) employees.

The SI policies and procedures for the application and assignment of Travel Cards conform to practices of other government travel card programs and requirements of the General Services Administration (GSA) SmartPay2 contract with JPMorgan Chase (JPMC) bank. JPMC is the SI Travel Card provider.

Employees with questions concerning the use of the SI Travel Card may contact the Charge Card Program (CCP) staff in the Simplified Acquisitions Division, Office of Contracting and Personal Property Management (OCon&PPM). Questions concerning official travel policy and procedures should be directed to the Travel Management Office (TMO), in the Office of the Comptroller (OC).

1.1 Travel Card Program Management

The Director, OCon&PPM, is responsible for providing Travel Cards to eligible SI employees for use when traveling on official SI business. As allowed in a delegation of authority from the Secretary of the Smithsonian, the Director, OCon&PPM, has delegated the authority for day-to-day management and oversight of the Travel Card Program to the CCP Branch Manager, OCon&PPM and the authority to take all necessary actions to ensure integrity in the Travel Card program. The CCP Manager, as the designated Agency/Organization Program Coordinator (A/OPC) for the SI Charge Card program, is authorized to represent the Director at internal and interagency meetings when discussions relate to government travel card programs.

The CCP Manager is responsible for establishing, maintaining and promulgating SI Travel Card program policies and procedures and ensuring that updates are distributed SI-wide. The CCP Manager ensures that the proper internal controls for the Travel Card program are in place and conducts reviews on the use of assigned Travel Cards by Cardholders. The reviews assist the CCP Manager with assessing and reporting on compliance with policies and procedures and identifying, determining, and advising managers on appropriate corrective actions when misuse or abuse of Travel Cards is verified. Information regarding oversight and remedial action procedures are included in Chapter 7.0, Management Oversight and Corrective Actions, of this desk reference.

1.2 Mandatory Use of Travel Cards

Smithsonian employees who are issued a Travel Card are required to use the Travel Card for allowable and authorized expenses related to official travel to the maximum extent that merchants accept the card. SI employees who anticipate traveling on official SI business one or more times per year shall complete required training and apply for a Travel Card. The use

of a Travel Card benefits both the SI and its employees. In addition to reducing the administrative burden associated with processing common carrier ticketing and tracking travel advances, employees avoid having to use personal funds when required to travel in performance of their official duties and responsibilities.

Upon receipt and activation of a Travel Card the Cardholder shall use the Travel Card to pay for common carrier tickets (air, rail and bus), lodgings, meals, automobile rentals, and/or authorized incidental expenses incurred while traveling on official Smithsonian business. Cardholders may also obtain cash advances from an Automated Teller Machine (ATM) with their Travel Cards for authorized official travel-related business expenses (see Section 3.3.3).

1.2.1 Benefits of Using a Travel Card

The following list of benefits is extended to SI employees when they use a Travel Card. This coverage is in addition to statutory coverage for injury or damage to employees and their belongings on official duty (e.g., Federal Employees Compensation Act, Military Personnel and Civilian Employee Claims Act).

- a. Travel accident insurance while on travel associated with traveler tickets charged to a Travel Card. This insurance also covers public conveyance to/from the airport.
- b. Insurance for lost or stolen baggage while traveling on traveler tickets charged to the Travel Card.
- c. Auto rental insurance.
- d. Worldwide emergency Travel Card replacement within 24 hours (where practicable).
- e. Automatic enrollment in the Emergency Assistance Program which provides:
 - Emergency card replacement or emergency cash
 - Emergency medical and referral assistance
 - Emergency legal referral assistance
 - Lost or stolen Travel Card reporting
 - Emergency transportation assistance
 - Emergency ticket replacement
 - Lost luggage assistance
 - Emergency message service
 - Emergency translation service
 - Prescription assistance and valuable document delivery
 - Pre-trip assistance

Additional information about Cardholder benefits is available from JPMC customer service (see *Where to Go for Help*).

In addition, since Travel Cardholders are recognized as federal government employees, using the Travel Card makes it easier for SI employees to obtain government rates for bus, rail, and airline tickets; rental cars; and hotel rooms when traveling out-of-area on official SI business.

1.2.2 Cardholder Rights and Protections

JPMC may not subject Cardholders to:

- a. Preset expenditure limits;
- b. Credit checks on SI employees designated to receive Travel Cards. **Note:** credit checks are not conducted unless otherwise specified by the SI in accordance with risk mitigation procedures;
- c. Releases of Cardholder credit information to any entity or person other than authorized GSA or SI officials or the Cardholder (this includes credit information associated with suspended or canceled individually billed accounts that are delinquent fewer than 180 days);
- d. The sale or other transfer of Cardholder names or addresses to other commercial interests;
- e. Membership fees;
- f. Commercial advertisements or other forms of solicitation with monthly billing statements;
- g. Issuance or cancellation of Travel Cards without notifying the authorized SI officials, nor;
- h. Liability for fraudulent charges made with a lost or stolen Travel Card provided that the Cardholder notifies JPMC immediately upon discovering the card is missing.

1.3 Cardholder Responsibilities

There are specific responsibilities associated with being an SI Travel Cardholder.

SI Travel Cardholders must:

- a. Protect and keep safe from unauthorized use their issued Travel Cards and account numbers;
- b. Use their Travel Cards only for approved and authorized expenses to be incurred while traveling on official SI business;
- c. Never use their Travel Cards for personal purchases or to pay other individuals' personal or travel-related expenses, including expenses for other SI employees;
- d. Submit all travel vouchers for reimbursement of expenses charged to their Travel Card accounts within five (5) business days of completion of travel or every thirty (30) calendar days when on extended travel;
- e. Review the monthly statements they receive from JPMC to ensure all charges that appear are correct, and immediately notify JPMC when charges are not correct;

- f. Notify JPMC customer service and the CCP staff immediately when home addresses and business and personal telephone numbers on file with JPMC change; and,
- g. Pay their monthly JPMC Travel Card account bills in full and by the due date cited on the monthly statements regardless of the payment status of any outstanding travel vouchers.

The above terms are agreed to by employees when they sign the Travel Card application prior to submitting it to the Charge Card Program, OCon&PPM.

1.4 Exceptions/Exemptions to Application for and Use of Travel Cards

The CCP Manager is authorized to allow *exceptions* to the “mandatory use” policy for SI employees when: an employee does not have a Travel Card and there is not sufficient time to obtain a Travel Card in advance of initial required travel dates; an employee will not be required to travel at least once a year; or, ticket purchases will be made more than 30 calendar days in advance of travel. In these circumstances the TMO Manager may centrally bill costs for common carrier tickets. Employees who are provided an *exception* to the mandatory use policy may receive cash travel advances from OC.

Smithsonian employees who request to be *exempt* from the requirement to obtain and use a Travel Card when traveling on official SI business must obtain an exemption in writing from the Director, OCon&PPM. Employees and their supervisors should contact the CCP staff for advice when they propose to submit a request for *exemption* to the mandatory use policy. Employees who are allowed an *exemption* may not receive cash advances from OC, except where necessary to cover anticipated field expenses authorized on an *OCon 501, Field Expenses Review and Authorization* form (e.g., payment of local research site workers and procurement of provisions).

CHAPTER 2.0 Applying for and Receiving Travel Cards

As expressed in Section 1.2, an SI employee is required to complete an application for a Travel Card when the employee will be required to travel on official SI business one or more times per year, so long as:

- a. The employee's administrative officer/travel coordinator or supervisor recommends to the employee that they obtain a Travel Card; and,
- b. The head of the museum, research center, or office (Unit Director) where the employee works authorizes participation.

2.1 Training and Application for Travel Cards**2.1.1 Pre-Application Training**

After employees secure the required approvals from their unit managers to obtain a Travel Card, GSA-sponsored online Travel Card Training must be completed. This training is accessible at <https://training.smartpay.gsa.gov>. Upon completing the training, employees must print one copy of the certificate to be included in the employee's Travel Card application package submitted to CCP. The CCP Manager may require Travel Cardholders to complete Travel Card training every three years (refresher), or as deemed necessary.

2.1.2 Applications

After the required Travel Card training is completed, and in advance of initial travel dates, applicants must visit the OCon&PPM Prism Website (see *Where to Go for Help*) and download copies of the following from the items listed under *Travel Cards*:

- A copy of the JPMC Travel Card Application w/ Individually Billed Cardholder Agreement (IBA); and,
- Instructions for Completing the JPMC IBA Travel Card Application.

All fields on the JPMC travel card application must be completed by applicants and CCP staff. Applicants must provide the name, home/residence address, Social Security Number, and Date of Birth as reflected in their official personnel record in the Office of Human Resources (OHR).

It is important that applicants ensure that all information provided on an application is correct. Employees must understand the terms and conditions that they, the SI, and JPMC agree to for issuance of a Travel Card. Employees should contact the CCP staff with any questions regarding the application before signing and forwarding the completed application to the CCP.

2.1.3 Submitting Travel Card Applications

All JPMC travel card application packages shall be submitted to the CCP staff at OCon&PPM, Attn: CCP-Travel Card Program, and include the following forms and information:

- a. Cover memo from the Unit Director verifying the applicant's employment status. (This memo must include a statement confirming the employee will be required to travel in performance of official duties);
- b. A properly completed and signed original JPMC Travel Card Application and the signed JPMC IBA; and,
- c. A copy of the Travel Card Training Certificate received after completing the on-line GSA Travel Card Training.

The CCP staff informs applicants when application packages are received. CCP staff reviews each Travel Card application package for completeness and contacts applicants and/or unit managers when any required information is omitted by applicants. Applications accepted by the CCP staff are forwarded to the CCP Manager for signature and then sent to JPMC for processing.

2.2 Receipt of a Travel Card and Card Activation

Smithsonian employees receive their Travel Cards via U.S. Postal Service at their home/residence addresses, normally within two weeks from the date applications are received at CCP. Travel Cards must be activated by Cardholders prior to commencing travel by calling the toll-free telephone number on the label affixed to the Travel Card.

Note: Receipt of a Travel Card is not an authorization to travel or incur expenses with the Travel Card. All travel and travel-related expenses by employees must be pre-approved on a travel authorization.

A personal identification number (PIN) shall be mailed separately to Cardholders by JPMC and will be necessary to obtain cash travel advances from financial institutions, either at an ATM or customer service counter, which can be accomplished only after the Travel Card is activated. Cardholders should memorize their PIN or keep it in a place separate from where the Travel Card is kept; *do NOT write the PIN on the Travel Card*. In the event a PIN needs to be replaced, Cardholders must contact the JPMC customer service and request a new PIN. A 24- to 48-hour activation delay may be experienced when obtaining a new PIN over the phone. During this period, Cardholders should obtain cash advance from the customer service counter (bank teller) within a financial institution.

2.3 Travel Card Spending Limits

The monthly spending limit for an individually billed government travel card is generally \$10,000. Of this allowable monthly amount, not more than 50 percent may be in cash advances (see Section 3.3.3, Cash Advances). If a spending limit increase is required, the traveler must contact CCP prior to commencing travel. The CCP will validate the request against the approved travel authorization in GovTrip.

CHAPTER 3.0 Proper Use of Travel Cards

Travel Cards are authorized to be used only for out-of-area expenses related to official Smithsonian business or authorized local Development, Representation, and Business (DRB) activities (see Appendix 322-1-A). Use of Travel Cards for any other purpose constitutes misuse and/or abuse of Travel Cards. Misuse and/or abuse of Travel Cards can result in Travel Card accounts being suspended or canceled and Cardholders may be subject to disciplinary action, including termination of SI employment.

At no time may Cardholders use their SI Travel Card to pay for expenses incurred by others (including fellow SI travelers) and personal expenses.

3.1 Supportive Smithsonian Directives

See Chapter 7.0, Management Oversight and Corrective Actions, and *Table 322-1-1, Travel Card Misuse and Abuse: Table of Management Actions*, for information on actions required to prevent misuse and abuse and actions to be taken to correct occurrences of Travel Card misuse and abuse.

3.1.1 Smithsonian Directive 103, Standards of Conduct

The *SD 103, Smithsonian Standards of Conduct*, provides in part that employees: must ensure that their conduct does not compromise the integrity of, and public confidence in the SI; must avoid actions that might conflict or appear to conflict with Smithsonian interests, such as using their SI employment for private gain; and must pay their just financial obligations in a proper and timely manner.

3.1.2 Smithsonian Directive 323, Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds

The *SD 323, Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds*, states in part, “If it is discovered that a Travel Cardholder used the Travel Card inappropriately and in a manner that is a violation of this directive [SD 323] and its accompanying *Use of Funds Handbook*, the Cardholder will be subject to the penalties and actions specified in the Institution’s Travel Card policy.”

3.2 Authorized and Unauthorized Use of Travel Cards**3.2.1 *AUTHORIZED* Use of SI Travel Cards on Official Travel**

- Common carrier tickets (e.g., rail, bus and airline tickets)
- Car rentals for official travel purposes
- Employee lodging, and meals, miscellaneous and incidental expenses (per diem or actual expenses) related to official travel.

- Expenses related to development, donor cultivation, and business activity expenses, to the extent that such expenses are included on a travel authorization or reviewed and approved on travel vouchers for reimbursement
- Travel cash advances from ATMs, not to exceed the amount of authorized reimbursable expenses on an approved SI Travel Authorization.

3.2.2 UNAUTHORIZED Use of SI Travel Cards

- Expenses not approved in advance on an SI Travel Authorization or not related to official out-of-area travel.
- Personal expenses or other expenses not related to authorized SI official business travel.
- Other individuals' personal or travel-related expenses.
- Cash advances not associated with out-of-area travel and not approved on a SI Travel Authorization.

3.3 Travel Authorization Procedures

Travel Cardholders must abide by the SI travel policies and procedures included in *SD 312, Travel*, and additional guidance and procedures included in its accompanying *SI Travel Handbook*. All official SI travel and allowable travel-related expenses must be approved on a travel authorization prior to commencing official travel. Use of Travel Cards absent a properly completed and approved travel authorization is prohibited.

3.3.1 Travel Authorization via the SI Automated Travel System (currently GovTrip)

All SI employees who travel on official SI business are required to enter anticipated travel-related expenses for planned travel in the SI automated travel system (currently GovTrip). The electronic processing capability of GovTrip shall automatically forward travel plans and anticipated expenses to the traveler's supervisor for review and approval. Upon completion of this process, SI travelers will have authorization to incur charges related to the authorized travel.

3.3.2 Common Carrier Ticket Charges

3.3.2.1 Airline Tickets

Most airline tickets purchased through the GovTrip system are automatically billed to the Cardholder's Travel Card account. Obtaining tickets via GovTrip or through use of the Travel Card allows the Cardholder to buy tickets at GSA contract city-pair fares. Where necessary, the TMO may use a Smithsonian centrally billed travel account.

3.3.2.2 Other Means of Transportation

Rail tickets may be purchased directly from Amtrak with a Travel Card. The use of buses, other rail, and ferry services may also be purchased using a Travel Card.

3.3.2.3 Unused Tickets

Travelers are responsible for resolving issues with complete and/or partially used common carrier tickets. Unused electronic tickets must be reported to the issuing carrier or travel agency to ensure a refund is processed.

3.3.2.4 Lost Tickets

Cardholders are responsible for reporting lost common carrier tickets to the issuing carrier or travel agency as soon as possible. Lost ticket refunds may take up to six months to resolve. Since the refund of a lost ticket is not guaranteed, the Cardholder must pay the amount of the lost ticket as it appears on their monthly statement from JPMC.

3.3.3 Cash Advances

Travel Cardholders are permitted to obtain cash advances with their Travel Card only for estimated out-of-pocket travel expenses not payable with their Travel Card, (e.g., taxis, meals, allowable incidental items). Cash advances from ATMs may not be obtained more than five days before travel commences or after the last day that the Cardholder is in official travel status.

Should emergency expenses arise while a Cardholder is on official travel and additional cash above the trip cash advance dollar limit is required, Cardholders may obtain the additional required cash from an ATM. During any month that multiple trips occur and the sum of cash advances already exceeds the allowable monthly ATM transaction limit, the Cardholder may need to obtain the necessary cash inside the financial institution. In all cases when ATM cash advances exceed the allowable dollar limits, a written justification for the emergency cash advance(s) must be prepared and submitted by the Cardholder along with the travel voucher. Cardholders may include the ATM transaction fee related to approved emergency cash advances on their travel vouchers for reimbursement.

CHAPTER 4.0 Travel Card Security

Travel Cardholders are responsible for the security of their assigned Travel Cards. When not traveling on official SI business, Cardholders are encouraged to secure their Travel Cards in a place not accessible to unauthorized users and to prevent inadvertent use in lieu of personal charge/credit cards for personal purchases.

4.1 Disclosure of Account Numbers

Travel Cardholders are cautioned against releasing their Travel Card or Travel Card account number to anyone other than TMO staff, contractor travel agencies, hotel or rental car companies when making reservations, individuals collecting payment for authorized travel-related expenses, or an SI staff member assisting with travel arrangements. Cardholders must never divulge the PIN associated with their Travel Cards to anyone.

4.2 Lost, Stolen and/or Emergency Card Replacement

Cardholders shall report lost or stolen Travel Cards immediately to the JPMC customer service center and request issuance of a replacement card. The JPMC customer service may be reached twenty-four (24) hours a day; seven (7) days a week (see *Where to Go for Help*). Replacement cards and PINs will be mailed separately and only to the Cardholder address on record at JPMC.

Note: A Cardholder will not be held financially liable for fraudulent charges made with a lost or stolen card, provided the Cardholder immediately notifies JPMC upon discovering that the card is missing. Cardholders may be required to review any charges considered fraudulent and sign an *Affidavit of Charge Card Fraud* as a disclaimer of unauthorized charges. Failure to submit and return the Affidavit to JPMC may result in liability for charges shifting to the Travel Cardholder.

4.3 Surrendering Travel Cards

4.3.1 Departing Employees

When a Cardholder leaves SI employment, i.e., resigns, retires, or transfers to another agency, the Cardholder must cut the Travel Card in half and surrender it to their supervisor or administrative personnel. The Smithsonian Employee Exit Clearance System (SEECs) point of contact at the unit must indicate in SEECs that the Travel Card has been surrendered by the departing employee in order for the SEECs point of contact in OCon&PPM to also clear the employee. The CCP staff will then be notified via email by the OCon&PPM point of contact for SEECs that the card has been tendered and CCP staff will contact JPMC to request that the Cardholder account be closed. The CCP staff will advise the departing employee and the unit if a balance is outstanding on the account.

4.3.2 Transferring Employees

The CCP Manager is informed by the SEECs point of contact in OCon&PPM when a Cardholder transfers to another Smithsonian unit. The CCP staff will then contact the Unit Director at the museum, research center or office to which the employee is reassigned to request a memo to the CCP Manager confirming that the Cardholder is continuing SI employment and will be required to travel. The employee will retain the Travel Card; however, if the CCP Manager does not receive the required memo from the Unit Director in a timely manner the Cardholder's account shall be closed.

4.4 Expired Travel Card Replacement

Travel Cards with impending expiration dates will be replaced by JPMC no earlier than 40 calendar days prior to the expiration date of currently held Travel Cards. Replacement Travel Cards are mailed to home/residence addresses on file with JPMC. When a Cardholder will be on extended travel at the time his/her Travel Card will expire the CCP staff should be contacted so that a replacement Travel Card may be requested and issued before the date that travel is scheduled to commence.

4.5 Travel Cardholder Recertification

The CCP staff shall periodically contact unit administrative staff to determine numbers of Cardholder accounts to be continued, established or canceled.

CHAPTER 5.0 Reimbursement for Travel Card Charges

Smithsonian management is committed to timely reimbursing SI employees for authorized and allowable travel expenses. When Travel Cardholders submit travel vouchers within the time frame required by *SD 312, Travel*, and its accompanying *Travel Handbook* and supervisors/managers timely review and approve travel vouchers. Cardholders will avoid the use of personal funds to pay Travel Card charges billed by JPMC.

5.1 Travel Vouchers

To facilitate timely reimbursement of authorized travel-related expenses paid with their Travel Cards, SI Travel Cardholders must complete travel vouchers in GovTrip within five (5) business days after travel is completed, or every thirty (30) calendar days when on extended travel. Travelers' supervisors/managers must ensure that travel vouchers are reviewed and approved in the SI Automated Travel System (currently GovTrip) as soon as possible after receiving notice that a travel voucher is pending review and approval.

Cardholders shall normally receive reimbursement within 10 business days from the date that a properly completed travel voucher is approved in the SI Automated Travel System (currently GovTrip).

5.2 ATM Transaction Fees

ATM cash advances and associated fees appear with other travel and expense transactions on Travel Cardholders' monthly bills from JPMC. The ATM transaction fees incurred by Travel Cardholders must be entered on travel vouchers. Reimbursement for ATM fees shall be limited to the fee amount applicable to the authorized cash advance amount that is reflected on the travel authorization.

Note: The cash advance fee is 2.5% of the amount of each cash advance transaction with a minimum fee of \$3.00, e.g., 2.5% of \$100 is \$2.50, but the bank will charge \$3.00 for the \$100 cash advance. In some cases, an additional surcharge may be imposed by the ATM operators and may be claimed on the travel voucher.

5.3 Canceled Trips

Travel Cardholders are required to prepare and submit travel vouchers to claim any authorized charges incurred and charged to their travel card accounts prior to cancellation of travel, e.g., carrier booking fees, ATM cash advance fees, other merchant fees. The Cardholder, upon receipt of the monthly statement, must send payment to JPMC for any undisputed charges.

CHAPTER 6.0 Travel Card Account Management and Payments

Smithsonian Directive 103, Smithsonian Institution Standards of Conduct, requires SI employees to pay debts properly and in a timely manner. Smithsonian Travel Cardholders, not the SI, are personally responsible for remitting payment to JPMC for all undisputed charges reflected on the monthly bills they receive from JPMC.

6.1 Individually Billed Accounts

Travel Card account statements are sent monthly to SI Travel Cardholders at the home/residence addresses on file with JPMC. The statements are mailed by JPMC within five (5) business days after each billing cycle cutoff and Cardholders are responsible for reconciling charges and making payment in full to JPMC each month. Travel Cardholders are required to inform JPMC as soon as possible of an address change to avoid delays in receiving their monthly statements. Cardholders who do not receive a monthly statement within ten (10) calendar days after a billing cycle cutoff should contact JPMC customer service and request a duplicate statement or view a copy of their statement online (see *Where to Go for Help*).

6.1.1 Monthly Reconciliation

Travel Cardholders shall review and reconcile all charges included on the JPMC monthly statement they receive with their records of charges made to their individually billed Travel Card accounts. All erroneous charges, and disputed charges (see Section 6.3 below), must be called to the attention of JPMC customer service immediately for assistance with determining which charges may be deducted from the payment amount to be remitted. Not all merchants will bill in time for charges to appear on the monthly statement closest to the charge date; therefore, charges for which Cardholders have already received reimbursement must be held pending future monthly statement(s) on which the charges will appear and must be paid.

6.1.2 Payment of Valid Charges

All valid charges that appear on the JPMC monthly statements issued to a Travel Cardholder must be paid to JPMC in full and by the due dates cited on the monthly statements. Cardholders have the option of paying their bills via check to the JPMC payment address, over-the-phone with JPMC, or online through use of the JPMC Online Payment System (see *Where to Go for Help*). Employees' failure to timely pay all undisputed charges reflected on the JPMC monthly statements will result in remedial administrative action by the CCP manager, and disciplinary action by unit managers. See Chapter 7.0, Management Oversight and Corrective Actions, and *Table 322-1-1, Travel Card Misuse and Abuse: Table of Management Actions*, for the types of actions to be considered when Travel Card accounts become delinquent or other misuse or abuse of Travel Cards is verified.

Note: In the event of a government-wide shutdown, Cardholders may be unable to make payments. The Smithsonian will ensure that during such periods, JPMC will not age accounts, cause delinquent or suspend, or take action to cancel or close accounts. During this time, finance charges may not be assessed; however, monthly statements will continue to be generated by JPMC.

6.1.3 Past Due and Delinquent Travel Card Accounts

Late payment of Travel Card accounts and Travel Card account delinquencies are considered misuse and/or abuse of Travel Cards. This type of misuse and/or abuse can result in Travel Card accounts being suspended or canceled (closed) and Cardholders may be subject to disciplinary or adverse personnel action.

Travel Card accounts are considered to be past due if payment for any undisputed account balance is not received at JPMC by the payment due dates.

Accounts are considered “delinquent” when full payment for any undisputed account balance is not received at JPMC within 61 calendar days of the statement date. Failure to pay the undisputed account balance within 60 calendar days from the statement date on which the original charge appears will result in an automatic suspension of the Travel Card account by JPMC. If an account is suspended twice during a 12-month period for delinquency and is past due again, the account may be closed by JPMC or the CCP Manager.

SI employees whose Travel Card account is suspended or closed shall be considered a Travel Card “*declinee*.” Travel Card declinees may not receive travel cash advances from OC, except for anticipated field expenses and are required to use their personal financial resources for official travel and then request reimbursement for authorized travel-related expenses.

6.2 Smithsonian Centrally Billed Travel Card Account

SI uses a centrally billed account to purchase tickets for non-Smithsonian employees traveling at the invitation of the SI. In addition, where necessary, the TMO may use a centrally billed account in lieu of an employee’s individually billed account when determined in the best interest of the traveler and the SI (see Section 1.4). All tickets purchased using the centrally billed account entitles the ticket holder to the same benefits extended to individual Cardholders.

6.3 Disputed Charges

A disagreement between a Cardholder and a merchant concerning a charge that appears on the Cardholder’s JPMC monthly statement is considered a dispute. It is each Cardholder’s responsibility to resolve disputes with merchants or with TMO when a transportation ticket was purchased through GovTrip. Disputes are typically attributable to one of the following:

6.3.1 Merchant Service and Delivery Issues

Issues concerning defective or unsuitable delivery of merchant services, non-delivery of merchant services, and unresolved transactions are normally categorized as merchant service and delivery issues. Travel Cardholders are responsible for making a reasonable attempt to resolve such issues directly with the merchant as they would for charges to their personal credit or charge card accounts. This approach has the greatest potential for quick and efficient resolution. If no resolution is reached with the merchant, Cardholders should contact JPMC to report the disputed charges.

6.3.2 Billing Errors

Questionable charges, duplicate billings, and/or charges not authorized by Cardholders that appear on monthly statements are categorized as Billing Errors. Cardholders must immediately contact JPMC customer service when they recognize errors on the monthly statements they receive from JPMC. JPMC will issue a “temporary” credit to the Travel Card account when a charge is disputed. JPMC will investigate the disputed charges and mail the Cardholder a statement explaining its findings. If JPMC determines that a billing error *did not* occur, the transaction amount will appear on the next monthly bill to the Cardholder. If JPMC determines that a billing error *did* occur, the Cardholder will be sent a letter advising them that the error has been corrected and the credit will remain on the Cardholder’s account.

In all other cases (such as possible fraud), Travel Cardholders must contact JPMC Customer Service Center to report the disputed charges. In most cases JPMC will issue an immediate credit to the account but will require the Cardholder to complete a Dispute Form to document the problem. JPMC will investigate the dispute and advise the Cardholder accordingly.

6.4 Cardholder Inquiries

Inquiries concerning billings or adjustments to billed amounts should be directed to JPMC Customer Service. Policy questions concerning issuance and use of the SI Travel Cards should be directed to the CCP staff. Contact information is listed on the *Where to Go for Help* page.

CHAPTER 7.0 Management Oversight and Corrective Actions

The CCP Manager, OCon&PPM, is responsible for providing assurance to the Director of OCon&PPM, that SI Travel Card program policies and procedures, internal controls, and methods for assessing compliance with program requirements by Travel Cardholders and CCP staff are effective, efficient, and assist with ensuring integrity in program operations. Travel Card program internal controls, and the associated compliance review methodology, conforms to *SD 310, Financial Reporting and Risk Management Internal Controls*, to ensure sound business practices and safeguards exist to minimize fraud, waste, abuse and mismanagement in the use of Travel Cards. Reports on program activities are prepared by CCP staff and provided to the Director, Under Secretary for Finance and Administration/Chief Financial Officer (USF&A/CFO), and other SI managers as necessary or requested.

7.1 Policies and Procedures

SI Travel Card program policies and procedures are established, updated as necessary, and disseminated SI-wide by the CCP Manager through the following means:

1. *SD 322, Charge Card Program* (available on Prism), in which general policy regarding applications for, issuance, and use of government-sponsored charge cards, including the SI Travel Card, is established;
2. This *Charge Card Program Desk Reference (SD 322), Part 1 — Travel Card Program* (available of Prism);
3. SI-wide email reminders on what is *Proper Use of Travel Cards* transmitted each calendar quarter;
4. Travel Card Program **Alerts** (available on Prism) issued when special attention to Travel Card program policies and procedures by SI employees is determined be necessary;
5. Distribution of information from external authorities, such as GSA and the Office of Management and Budget, that may impact SI Travel Card program policy and procedures; and,
6. Addressing SI employees at unit staff meetings and SI administrative and management committees.

7.2 Internal Controls

The policies, procedures and program guidance promulgated by the CCP Manager and staff cover the internal controls necessary for assessing the degree of compliance with Travel Card program policies and procedures by employees at all organizational levels. The internal controls established and monitored by the CCP Manager serve to ensure that:

1. The CCP structure, functions, and staffing are organized to foster effective and efficient program administration and management oversight, liaison with JPMC, and support to SI staff.
2. Program policies, procedures, and Cardholder requirements are kept up to date and available and accessible to all SI employees.

3. Travel Card training is completed by SI employees prior to submitting applications for Travel Cards to the CCP staff.
4. Applications with other required information required from SI employees are received, reviewed and determined to be complete and correct by CCP staff prior to the CCP Manager submitting applications to JPMC.
5. All personal identifiable information and account data provided to CCP by SI employees, or of which CCP staff becomes aware (via JPMC applications, Cardholder account numbers, payment history, etc.) are treated as strictly confidential.
6. Files and records of Travel Card account activity and reports maintained by CCP staff are always secure and not accessible to anyone other than CCP staff.
7. Cardholders provide proper and timely attention to the monthly bills they receive from JPMC and pay undisputed charges in full each month.
8. Managers take appropriate and/or recommended actions to assist with resolving Travel Cardholder account delinquencies.

7.3 Compliance Assessment Methodology

The CCP staff monitors myriad Travel Card activities on a daily basis by reviewing JPMC reports and conducting necessary transactional data-mining.

The CCP staff is required to report to the CCP Manager any detected misuse and/or abuse of Travel Cards, such payment of expenses for which Travel Card use is not authorized, indications of late payments, and new or continued delinquent accounts. In such instances the CCP Manager is authorized to:

1. Request Cardholders submit explanations related to account delinquencies and questionable charges or patterns of Travel Card use.
2. Involve Unit Directors in resolution of issues when Cardholders do not respond to CCP requests for information within required timeframes.
3. Determine when Unit Directors, the appropriate Under Secretary, the USF&A/CFO and/or the Chief of Staff, Office of the Secretary, or the Office of the Inspector General should be notified of misuse and/or abuse.
4. Prepare memoranda from the USF&A/CFO to the appropriate Under Secretary/Director when Cardholder account reflects repeated misuse or abuse, including unresolved account delinquencies and may suggest appropriate management action as delineated in *Table 322-1-1, Travel Card Misuse and Abuse: Table of Management Actions*.

7.4 Compliance Reports

In accordance with Governance Committee Recommendation No. 21, the CCP Manager provides quarterly reports to select SI senior managers. The reports reflect Card account usage and instances of misuse and abuse.

7.5 Misuse and/or Abuse Corrective Actions

The *Table 322-1-1, Travel Card Misuse and Abuse: Table of Management Actions*, on the following pages, lists the most frequently identified types of Travel Card misuse and abuse, and actions that shall be taken by Smithsonian employees when misuse or abuse of Travel Cards is identified.

TABLE 322-1-1 - Travel Card Misuse and Abuse: Table of Management Actions

When misuse or abuse of Travel Cards is identified, the Table 322-1-1 displayed on the following pages shall be used as a general guide to facilitate consistent action throughout the Smithsonian for comparable cases.

Employees will always be accorded due process when disciplinary or adverse action is suggested. To ensure consistency and fairness in establishing and reviewing all facts of a case, managers must consult the Labor/Employee Relations staff in the Office of Human Resources, who will consult with staff in the Office of General Counsel as necessary. When appropriate, the Charge Card Program (CCP) Manager shall refer instances of misuse and abuse of Travel Cards to the Office of the Inspector General for investigation.

The following factors shall be considered by the CCP Manager and supervisors and managers at SI units when determining whether to take remedial, disciplinary or adverse actions for identified misuse or abuse of Travel Cards:

- Whether the employee timely submitted a properly completed travel voucher;
- Whether Smithsonian procedures contributed to a Travel Card account delinquency by improperly delaying reimbursement after receipt of a properly completed Travel Voucher;
- The nature and seriousness of the offense under review;
- Whether the conduct was intentional, technical or inadvertent; or was for personal gain; or is frequently repeated;
- The employee's record of Smithsonian employment prior to the offense under review, and previous record of payments to JPMC; and/or
- Potential, or lack thereof, for adhering to the Smithsonian Travel Card Program policies and procedures and Cardholder responsibilities in the future.

Other considerations may be taken into account as well, e.g., the interval between offenses and/or whether a combination or series of different offenses by the same employee has occurred.

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
<p>Payment not submitted and received by JPMC by payment due date</p> <p><i>(Account payment past due)</i></p>	<p>1st Offense</p> <p>CCP staff sends weekly email reminders to the Cardholder until payment is made or the card becomes delinquent (31 days past payment due date), whichever occurs first.</p> <hr/> <p>Subsequent Offense</p> <p>Action above is repeated. When the frequency of offense becomes excessive the CCP Manager notifies the Unit Director or other manager.</p>	<p>1st Offense</p> <p>No action required</p> <hr/> <p>Subsequent Offense</p> <p>Unit director or other manager to take action as they deem appropriate.</p>
<p>Account payment identified to be more than 31 days past due and less than 60 days past payment due date.</p> <p><i>(Accounts delinquent 30–60 days; JPMC automatically suspends Travel Card use)</i></p>	<p>1st Offense</p> <p>CCP staff sends an email to the Cardholder notifying him or her that the account has been suspended and requests a written explanation for the delinquency, including the date the balance was or will be paid. A copy of the request is sent to the unit director or other manager.</p> <p>Cardholder is required to respond in writing within five business days.</p> <p>Cardholder must resolve delinquent account within 15 calendar days.</p> <p>*****</p> <p>When offense is not resolved within 15 calendar days, the CCP staff sends a follow-up email to the Card holder and unit director or other manager requesting a written explanation for the delinquency and a plan of resolution.</p> <p>Cardholder is required to respond in writing within five business days.</p> <p>Travel Card remains suspended until the matter is resolved.</p>	<p>1st Offense</p> <p>No action required</p> <p>*****</p> <p>Unit director or other manager shall consult the Labor/Employee Relations Staff (LER) in the Office of Human Resources for advice on appropriate disciplinary or adverse action.</p>

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
<p>Account payment identified to be more than 31 days past due and less than 60 days past payment due date.</p> <p><i>(continued)</i></p> <p><i>(Accounts delinquent 30–60 days; JPMC automatically suspends Travel Card use)</i></p>	<p>Subsequent Offense</p> <p>CCP Manager sends an email to the Cardholder and unit director or other manager requesting a written explanation.</p> <p>Cardholder's written response is required within five business days and must include the date that payment was or will be made.</p> <p>Cardholder must resolve delinquent account within 15 calendar days.</p> <p>The CCP Manager may suspend the Travel Card for a period between six months to two years. CCP Manager shall consult the unit director or other manager on the proposed action or to determine if an extended suspension of the Travel Card is warranted.</p>	<p>Subsequent Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action.</p>
<p>Account payments identified to be 60 to 90 days delinquent past the payment due date without a payback schedule agreed to by Cardholder and the CCP Manager, or non-compliance with payback schedule by the Cardholder.</p> <p><i>(Accounts delinquent 60–90 days; JPMC automatically suspends Travel Card use)</i></p>	<p>1st Offense</p> <p>CCP Manager sends an email to the unit director or other manager requesting intervention to resolve the delinquent account. The Cardholder receives a copy of the email.</p> <p>Cardholder must resolve the delinquent account within 15 calendar days.</p> <p>CCP Manager may suspend the Travel Card for a period between six months to two years and advise the unit director or other manager to consult LER staff. CCP Manager shall consult the unit director or other manager on the proposed action or to determine if an extended suspension of the Travel Card is warranted.</p>	<p>1st Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action.</p>

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
<p>Account payments identified to be 60 to 90 days delinquent past the payment due date without a payback schedule agreed to by Cardholder and the CCP Manager, or non-compliance with payback schedule by the Cardholder.</p> <p style="text-align: right;"><i>(continued)</i></p> <p><i>(CCP Manager suspends Travel Card use for a period of one to two years)</i></p>	<p>Subsequent Offense</p> <p>CCP Manager suspends the Travel Card for a period of one to two years.</p> <p>CCP Manager sends an email to the Cardholder and unit director or other manager notifying them of the repeat offense and resulting Travel Card suspension and advises the unit director or other manager to consult LER staff. A copy of the email is also provided to the USF&A/CFO and the LER staff.</p> <p>The USF&A/CFO may contact the appropriate Under Secretary and unit director concerning the abuse.</p>	<p>Subsequent Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action.</p>
<p>Accounts more than 90 days delinquent past the payment due date.</p> <p><i>(Travel Card account is closed permanently by JPMC)</i></p>	<p>1st Offense</p> <p>CCP Manager sends an email to the Cardholder and unit director or other manager notifying them of the offense and permanent closure of the card and advises the unit director or other manager to consult LER staff. A copy of the email is also provided to the USF&A/CFO and the LER staff.</p> <p>The USF&A/CFO may contact the appropriate Under Secretary and unit director concerning the abuse.</p>	<p>1st Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action</p>

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
<p>Use of Travel Card for personal expenses, including ATM withdrawals unrelated to official travel, <u>less than</u> \$500 per occurrence.</p> <p><i>(CCP Manager may suspend Travel Card use for six or more months when misuse or abuse is verified)</i></p>	<p>1st Offense</p> <p>CCP staff sends an email to the Cardholder requesting a written explanation of the charges. Cardholder is required to respond in writing within five business days. If use is determined inadvertent, the Cardholder is reminded of the policy and advised to exercise more care. If use is determined to be abuse, the CCP Manager may suspend the Travel Card for a period of not less than six months and informs the Cardholder and unit director or other manager of the suspension.</p>	<p>1st Offense</p> <p>Unit director or other manager may consult the LER staff for advice on appropriate disciplinary or adverse action.</p>
	<p>Subsequent Offense</p> <p>CCP Manager sends an email to the Cardholder requesting an explanation of charges. Cardholder is required to respond in writing within five business days. Repeated inadvertent use will result in notification to the unit director or other manager, requirement for online training, and/or temporary card suspension. If it is determined that a pattern of inadvertent use or intentional misuse exists, the CCP Manager closes the card permanently. An email notice of the closure is sent to the Cardholder and unit director or other manager advising them of the abuse. Unit director or other manager is advised to consult LER staff. A copy of the email is sent to the USF&A/CFO and the LER staff. The USF&A/CFO may contact the appropriate Under Secretary and unit director.</p>	<p>Subsequent Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action.</p>

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
<p>Use of Travel Card for personal expenses, including ATM withdrawals unrelated to official travel, that <u>exceeds</u> \$500 per occurrence.</p> <p><i>(CCP Manager closes Travel Card permanently when misuse or abuse is verified)</i></p>	<p>1st Offense</p> <p>CCP staff sends an email to the Cardholder requesting a written explanation of the charges.</p> <p>Cardholder is required to respond in writing within five business days.</p> <p>If it is determined that a pattern of inadvertent use or intentional misuse exists, the CCP Manager closes the card permanently.</p> <p>An email notice of the closure is sent to the Cardholder and unit director or other manager advising them of the abuse. Unit director or other manager is advised to consult LER staff. A copy of the email is sent to the USF&A/CFO and the LER staff.</p> <p>The USF&A/CFO may contact the appropriate Under Secretary and unit director concerning the abuse.</p>	<p>1st Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action.</p>

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
<p>Allowing another individual to use the Travel Card for an unauthorized purchase/ATM withdrawal or using the Card on behalf of another individual.</p> <p><i>(CCP Manager may suspend Travel Card use for six or more months when misuse or abuse is verified)</i></p>	<p>1st Offense</p> <p>CCP staff sends an email to the Cardholder requesting a written explanation of the charges.</p> <p>Cardholder is required to respond in writing within five business days.</p> <p>If use is determined to be abuse, the CCP Manager suspends the Travel Card for a period of not less than six months and advises the Cardholder and unit director or other manager of the suspension. Unit director, or other manager, has the discretion to consult with LER staff for advice on whether disciplinary or adverse action should be pursued.</p>	<p>1st Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action.</p>
<p>Allowing another individual to use the Travel Card for an unauthorized purchase/ATM withdrawal or using the Card on behalf of another individual.</p> <p><i>(continued)</i></p> <p><i>(CCP Manager cancels Travel Card permanently when misuse or abuse is verified)</i></p>	<p>Subsequent Offense</p> <p>CCP Manager sends an email message to the Cardholder and the unit director or other manager. Unit director or other manager is advised to consult LER staff. A copy of the email is sent to the USF&A/CFO and the LER staff.</p> <p>The USF&A/CFO may contact the Under Secretary and unit director concerning the abuse.</p>	<p>Subsequent Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action</p>

SD 322, Charge Card Program
Part 1 — Travel Card Program Desk Reference

Identified Misuse or Abuse	Charge Card Program (CCP) Manager Action	Unit Management Action
Use of the Travel Card to pay travel expenses authorized for other SI travelers, e.g., employees or invitational travelers.	<p>1st Offense</p> <p>CCP staff sends an email to the Cardholder requesting a written explanation of the charges.</p> <p>Cardholder is required to respond in writing within five business days.</p> <p>If misuse is determined to have occurred the CCP Manager sends an email warning to Cardholder and may require the Cardholder to repeat Travel Card training.</p>	<p>1st Offense</p> <p>No action required.</p>
	<p>Subsequent Offense</p> <p>CCP Manager sends an email to the Cardholder requesting an explanation of charges.</p> <p>Cardholder is required to respond in writing within five business days.</p> <p>If misuse is determined to have occurred the CCP Manager sends an email warning to Cardholder and may require the Cardholder to repeat Travel Card training.</p> <p>Repeated offenses may result in permanent closure of the Card.</p>	<p>Subsequent Offense</p> <p>Unit director or other manager shall consult the LER staff for advice on appropriate disciplinary or adverse action</p>

SD 322, Charge Card Program

Appendix 322-1-A

Use of Travel Cards for Development, Official Representation and Business Activity Expenses



Smithsonian Institution

**Office of the Under Secretary for Finance
and Administration/Chief Financial Officer
Office of Contracting
and Personal Property Management**

Use of Travel Cards for Development, Official Representation and Business Activity Expenses

TABLE OF CONTENTS

WHERE TO GO FOR HELP

CHAPTER 1.0:	Introduction.....	1
1.1	Background.....	1
1.2	Applicability	1
CHAPTER 2.0:	Incurring and Paying DRB Expenses	2
2.1	Use of Funds	2
2.2	Advance Approval Required.....	2
2.3	Types of Allowable DRB Expenses	2
CHAPTER 3.0:	Methods of Payments for DRB Expenses.....	4
3.1	Purchase Order.....	4
3.2	Purchase Card	4
3.3	Travel Card	4
3.4	Use of Personal Funds	5
CHAPTER 4.0:	Authorities and Responsibilities	6
4.1	Designating Employees Authorized to Incur DRB Expenses.....	6
4.2	Review and Concurrence Officials: Requests for Authority to Use the Travel Card for DRB Expenses in the Local Area.....	6
4.3	Office of Contracting and Personal Property Management.....	8
4.4	Responsibilities of Employees Authorized to Pay DRB Expenses with Travel Cards...	9
CHAPTER 5.0:	Requests for Reimbursement for DRB Expenses	10
5.1	DRB Expenses Incidental to Travel on Official Smithsonian Business	10
5.2	DRB Expenses Incurred in the Local Area.....	10
CHAPTER 6.0:	Administration and Management Oversight.....	12
6.1	Administration	12
6.2	Smithsonian Leadership and Unit Directors	12
6.3	Travel Cardholders.....	12
6.4	Misuse or Abuse of Authority to Use Travel Cards for DRB Expenses	13

WHERE TO GO FOR HELP

Office of the Secretary

Reviewing and concurring for DRB expense authority
to employees in the immediate Offices of the Secretary,
Under Secretaries, Assistant Secretary and Deputy Under Secretary

Chief of Staff..... (202) 633-1869

Offices of the Under Secretaries

Reviewing and concurring for DRB expense authority
to employees at the Museums, Research Centers and Offices

Under Secretary for Science (202) 633-5135
Under Secretary for History, Art and Culture..... (202) 633-5231
Under Secretary for Finance and Administration/Chief Financial Officer (202) 633-5241
Assistant Secretary for Education and Access (202) 633-0077
Deputy Under Secretary for Collections and Interdisciplinary Support (202) 633-5135

President of Smithsonian Enterprises

Reviewing and concurring for DRB expense authority
to employees at Smithsonian Enterprises

Smithsonian Enterprises Main Phone Number (202) 633-7320
President of Smithsonian Enterprises..... (212) 916-1313
Controller (202) 633-4921

Office of Contracting

Authority to employees for expanded use
of travel cards for DRB expenses

& Personal Property Management (OCon&PPM)

OCon&PPM Help Desk (202) 633-7410
OCon&PPM Help Desk Email..... OConHelp@si.edu
OCon&PPM Help Desk Fax (202) 633-7319
Web Access (Prism)..... <http://prism.si.edu/ocfo/ocon/ocon.htm>
OCon&PPM Forms..... http://prism.si.edu/ocfo/ocon/ocon_forms.htm
Main OCon&PPM Phone Number (for all OCon&PPM staff)..... (202) 633-7290

Charge Card Program Branch, Simplified Acquisitions Division

Robert E. Tanner, Charge Card Program Manager (202) 633-1739
Email..... tannerr@si.edu

JPMorgan Chase

Cardholder Inquiries and Customer Service Toll Free: (888) 297-0781
Collect: (847) 488-4442

Office of the Inspector General (OIG)

Main OIG Phone Number (202) 633-7050

CHAPTER 1.0: Introduction

1.1 Background

Many Smithsonian Institution (SI) employees' duties and responsibilities include participation in development, official representation, and business (DRB) activities of the Institution. Such duties and responsibilities may be significant and include establishing and maintaining relationships with individuals, corporations, foundations, and other entities that have professional relationships with SI, or that have the potential (long and short-term) to donate something of value to the Institution. Unit directors and appropriate other managers should consider the following factors when designating employees to be authorized to incur DRB expenses:

- a. Employees' positions within the Institution;
- b. Employees' DRB duties and responsibilities as described in position descriptions and/or performance plans, such as requirements to generate contacts, prospect donors, and provide donor/sponsor stewardship; and,
- c. Anticipated frequency of employees' involvement in development and official representation activities.

The activities of certain SI employees with substantive DRB duties and responsibilities may regularly involve incurring expenses within the commuting areas of their permanent duty stations (local area) for which use of a purchase card or purchase order (PO) is not allowed or efficient. To support the financial agility necessary for effective DRB activities, employees with significant DRB duties and responsibilities who regularly incur expenses in performance of their duties may be authorized to use their travel cards to pay authorized and pre-approved DRB related expenses.

Smithsonian Directive (SD) 323, *Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds* establishes policy governing the obligation and expenditure of federal appropriated funds and SI trust funds. The *Smithsonian Institution Use of Funds Handbook* (that accompanies SD 323) contains information for units on implementing the spending policies cited in SD 323. The *Smithsonian Institution Use of Funds Handbook* includes specific rules, guidelines, and procedures on how Smithsonian funds can and cannot be used.

1.2 Applicability

The guidelines in this handbook apply to all SI employees, whether or not they are involved in the development (fundraising), official representation, and business activities of the SI, who are authorized, in accordance with Chapter 4.0 of these guidelines, to use their government travel cards to pay DRB expenses incurred within the local area.

CHAPTER 2.0: Incurring and Paying DRB Expenses

2.1 Use of Funds

In the absence of legislation authorizing the use of federal appropriations for development or official representation, only SI trust funds may be used for DRB expenses. Specific guidance on Use of Funds for DRB activity expenses may be found in SD 323, *Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds* and Sections 1.2 through 1.4 in its accompanying *Use of Funds Handbook*.

2.2 Advance Approval Required

Smithsonian DRB expenses must be authorized in writing, in advance, and in accordance with unit administrative and funds control procedures. Unit directors, or their designees, are responsible for ensuring the proposed expenses are necessary expenses; consistent with the value of the particular DRB activity being undertaken; and whether the expenses are to be incurred within the commuting area of an employee's permanent duty station (local area) or when traveling on official SI business.

2.3 Types of Allowable DRB Expenses

The following examples are types of expenses that may be considered allowable DRB-related expenses and an appropriate use of Smithsonian funds, as defined in SD 323 and the *Use of Funds Handbook*:

- a. Meals, light refreshments, snacks, and alcoholic beverages;
- b. Social, cultural, or leisure events, including attendance at theaters/concerts; and spectator sports (baseball, football, golf tournaments), participatory activities (golf, tennis, etc.), and service establishments activities (such as athletic clubs);
- c. Receptions and celebratory and other events for the purpose of professional networking
- d. Providing of gifts for donors and representatives of sponsors to recognize life events (e.g., birthday, anniversary, wedding, hospitalization,) a business event, (e.g., new job, promotion), or holiday.

2.4 Unallowable Expenses

The following are types of events and activities that are not appropriate DRB expenses:

- Limited to members or representatives of a particular religious or political group, or to benefit a particular religious or political group;
- Conflict, or appear to conflict, with SI interests (as defined in *SD 103 Smithsonian Institution Standards of Conduct*), such as:

- i. Using SI employment for private gain
- ii. Giving preferential treatment to any person or company
- iii. Influencing what should be SI employees' impartial decisions on the Smithsonian's behalf;

Are discriminatory in nature (see SD 200, *Nondiscrimination in Events That Involve Smithsonian Officials*).

Employees are advised to always review Sections 1.2 through 1.4 in the *Smithsonian Institution Use of Funds Handbook (SD 323)* for additional and current information regarding allowable DRB-related expenses.

CHAPTER 3.0: Methods of Payments for DRB Expenses

The following four methods of payment are available for use by employees authorized to incur DRB expenses, including employees who are authorized to have expanded use of their travel cards to pay DRB expenses incurred within the local area (see Chapter 4.0). The purpose and time frame in which DRB expenses are incurred and/or must be paid will likely determine which method of payment below is appropriate.

3.1 Purchase Order

When there is sufficient advance planning for a development activity or event, a purchase order (PO) should be used for DRB expenses incurred within the local area and off site. Examples of these types of DRB expenses are: costs for event space or occasion shelter rentals, required equipment, catering services, and entertainers or ambience musical performers, such as chamber musicians, pianists or harpists.

3.2 Purchase Card

A purchase card may be used for catered food and beverage services at development functions conducted at SI locations. [Note: Catering agreements must be submitted to the Office of Contracting and Personal Property Management (OCon&PPM) for review and approval prior to each event.]

3.3 Travel Card

3.3.1 Expenses Incurred When Traveling on Official Smithsonian Business

Employees must use their government travel cards to pay approved DRB expenses incurred while traveling on official SI business, unless the DRB expenses are those for which use of a PO is more appropriate. Requests for reimbursement of DRB expenses paid with travel cards must be in accordance with Section 5.1 of this handbook.

3.3.2 Expenses Incurred Within Commuting Areas of Permanent Duty Stations (Local Area)

Use of a government travel card to pay for approved DRB expenses to be incurred within commuting distances of permanent duty stations may be authorized for employees with significant DRB duties and responsibilities. Such authorization must be requested by Unit Directors in accordance with Section 4.2 in this handbook and granted in a letter from the Charge Card Program Manager (see Section 4.3 below). Requests for reimbursement of allowable DRB expenses incurred within local areas of permanent duty stations and paid with travel cards shall be in accordance with Section 5.2. Use of the travel card in the local area (unless incidental to official travel) for DRB expenses is considered misuse of the travel card without the express written authority from the Charge Card Manager, OCon&PPM.

3.4 Use of Personal Funds

When the forms of payment cited in Sections 3.1 through 3.3 above are not feasible (including when expanded use of a travel card for local area expenses has not been authorized), employees must use personal funds or personal charge cards for allowable DRB expenses and submit requests for reimbursement. Approving officials will review requests and approve allowable DRB expenses for reimbursement.

When advance review and approval of DRB expenses is not possible, approving officials will review and approve the expense (if appropriate) as soon as possible after the expense is incurred.

Requests for reimbursement of approved DRB expenses paid with personal funds and personal charge cards shall be reimbursed on a properly completed SI-3153, Smithsonian Miscellaneous Reimbursement Voucher, in accordance with Chapter 5.0 of this handbook.

CHAPTER 4.0: Authorities and Responsibilities

4.1 Designating Employees Authorized to Incur DRB Expenses

Unit directors and other managers determine which employees in their organizations to assign DRB duties and responsibilities in accordance the criteria cited in Section 1.1. Unit Directors may designate one or more of their employees who, as a manner of performing their significant DRB duties, incur DRB related expenses within the local area on a regular basis. To assist these employees in the performance of these significant DRB duties and responsibilities, Unit Directors may request authority for expanded use of their travel cards to pay DRB expenses incurred locally and not payable with purchase cards or purchase orders (POs).¹

All requests for expanded use of travel cards to pay DRB expenses, either on a recurring or a case by case basis shall be submitted to the Charge Card Program Manager, through an employee's required unit chain of command and the appropriate Reviewing and Concurring Officials (see Table 1: Requests for Expanded Use of Travel Card Authority on page 7).

4.2 Review and Concurrence Officials: Requests for Authority to Use the Travel Card for DRB Expenses in the Local Area

Requests for employees to be authorized to have expanded use of their travel cards to pay DRB expenses to be incurred within the local area should be initiated by the employee's supervisor, and then submitted through unit chain of command to the appropriate Review and Concurrence Official (see Table 1 below) for approval. When concurrence is provided by the Review and Concurrence Officials, the requests are then submitted to the Charge Card Program Manager. Requests must clearly demonstrate the need for the expanded use of travel cards authority when use of a purchase card or purchase order (PO) is not appropriate or efficient.

Upon concurrence by the final Review and Concurrence Officer, all requests for expanded use of travel cards authority shall be submitted to the Charge Card Program Manager. See Table 1: Requests for Expanded Use of Travel Card Authority on pages 7–8.

¹ Regardless of whether expanded use of travel cards is authorized or whether DRB expenses are authorized on a case-by-case basis, prior review and concurrence of expenses must be obtained from the employee's appropriate reviewing and concurring officials.

Table 1: Requests for Expanded Use of Travel Cards Authority

Requests for:	Initial Review and Concurrence Official	Final Review and Concurrence Official	OCon&PPM
<ul style="list-style-type: none"> • All employees in the Office of the Regents • All employees in the immediate Office of the Secretary • Under Secretaries • President of Smithsonian Enterprises (SE) • Assistant Secretary • Deputy Under Secretary • General Counsel • Director, Office of Equal Employment and Minority Affairs (OEEMA) • Director, Office of Advancement (OA) • Director, Office of Communications and External Affairs (OCEA) 		<p>Chief of Staff Office of the Secretary</p> <p>All requests concurred with by the Chief of Staff will be submitted to the Charge Card Program Manager, OCon&PPM.</p>	<p>Upon receipt of requests for expanded use of travel cards authority for an employee, the Charge Card Program Manager will review the status of the employee's travel card account.</p> <p>For accounts in good standing and for which any outstanding issues are resolved in advance, the Charge Card Program Manager will issue a notice to the employee that:</p> <ul style="list-style-type: none"> • Cites expanded use of his/her travel card for DRB expenses within the local area is authorized; • Includes the specific event or date range for which the expanded use authority is granted when the authority is not recurring; and • Provides guidance for properly executing the granted expanded use authority. <p>The Charge Card Program Manager will inform the Initial and Final Review and Concurrence Officials when it is determined that expanded use of travel card authority to an employee should be withheld for any reason.</p>
<p>All employees in the immediate offices of the:</p> <ul style="list-style-type: none"> • Under Secretaries • President of SE • Assistant Secretary • Deputy Under Secretary • Office of General Counsel (OGC) • OEEMA • OA • OCEA 	<p>As appropriate:</p> <ul style="list-style-type: none"> • Under Secretary • President of SE • Assistant Secretary • Deputy Under Secretary • General Counsel • Directors of OEEMA, OA and OCEA <p>Concurrence must be obtained prior to being submitted to the Chief of Staff, Office of the Secretary.</p>	<p>Chief of Staff Office of the Secretary</p> <p>All requests concurred with by the Chief of Staff will be submitted to the Charge Card Program Manager, OCon&PPM.</p>	
<p>Directors of Museums Research Centers and Offices (Unit Directors), and their direct reports, except SE.</p> <p>See below for Smithsonian Enterprises employees.</p>	<p>Unit Directors must concur with requests for their direct reports prior to submitting the requests to the appropriate Under Secretary or the Assistant Secretary or Deputy Under Secretary.</p>	<p>The appropriate Under Secretary, the Assistant Secretary or Deputy Under Secretary</p> <p>Upon concurrence, requests will be submitted to the Charge Card Program Manager, OCon&PPM.</p>	

(Table continued on page 8)

Requests for:	Initial Review and Concurrence Official	Final Review and Concurrence Official	OCon&PPM
Employees at the Museums, Research Centers and Offices, except SE. See below for Smithsonian Enterprises' employees.	Directors of Museums Research Centers and Offices Managers and supervisors must concur with requests for expanded use of travel cards authority prior to submitting the requests to their Unit Director.	The appropriate Under Secretary, the Assistant Secretary or Deputy Under Secretary Upon concurrence, requests will be submitted to the Charge Card Program Manager, OCon&PPM	The Charge Card Program Manager will inform the Initial and Final Review and Concurrence Officials when it is determined that expanded use of travel card authority to an employee should be withheld for any reason.
Smithsonian Enterprises employees	SE organizational directors must concur with requests for their employees prior to submitting the requests to the President of Smithsonian Enterprises.	President of Smithsonian Enterprises All requests concurred with by the President of SE will be submitted to the Charge Card Program Manager, OCon&PPM.	

4.3 Office of Contracting and Personal Property Management

The Director, OCon&PPM, has assigned the Charge Card Program Manager responsibility for taking appropriate and timely action on requests for expanded use of travel cards that are received from the Chief of Staff in the Office of the Secretary, Under Secretaries, Assistant Secretary, President of SE, or Deputy Under Secretary. Action by the Charge Card Program Manager entails:

- a. Reviewing each travel cardholder's account status and payment history to assure there has been proper account management by cardholders. Concerns related to late payments or account delinquencies greater than 60 calendar days shall be raised with employees and supervisors for resolution prior to the requested expanded use authority being issued.
- b. Issuing notices to all employees who are authorized expanded use of their travel cards and include with such notices guidance for properly executing the expanded use authority and avoiding instances of actual or perceived misuse and/or abuse of the authority.
- c. Monitoring use of travel cards for DRB expenses and obtaining information from cardholders to clarify purpose of charges when they are perceived to be extravagant, non-DRB related, or otherwise inappropriate.
- d. Ensuring that action is taken immediately by travel cardholders to resolve disputed charges with JPMorgan Chase and that travel cardholders obtain necessary assistance from the Charge Card Program staff as required.

- e. Inform unit Directors when travel card expanded use authority should be withheld or rescinded when the travel cardholder has a history of or repeated delinquency or where misuse of the card has occurred.

The Charge Card Program Manager shall also notify employees when they are authorized to use their travel cards for DRB expenses on a case-by-case basis. Such notifications to employees shall occur upon receipt of requests from the appropriate Reviewing and Concurring Officials by the Charge Card Program Manager (see Sections 4.2.1 through 4.2.4 above).

4.4 Responsibilities of Employees Authorized to Pay DRB Expenses with Travel Cards

Regardless of whether expanded or intermittent use of travel cards to pay DRB expenses incurred locally is authorized, employees must obtain in writing, and in advance, approval of planned DRB expenses from their approving officials in accordance with unit administrative and funds control procedures. Unit directors, or their designees, may not authorize or approve their own DRB expenses. Employees who use a travel card or personal funds to incur DRB expenses must adhere to the following additional requirements:

- a. Employees must ensure that DRB expenses are necessary and supported by merchant receipts, participant lists, and other documentation required by approving officials, and presented at the time requests for reimbursements of expenses not paid by PO or purchase card are presented.
- b. In the absence of required prior authorization of DRB expenses incurred, employees shall provide a written explanation to their immediate supervisor why prior approval of DRB expenses was not obtained.
- c. Cardholders must ensure that action is taken immediately to resolve disputed travel card charges with JPMorgan Chase and when necessary, seek assistance from the Charge Card Program staff.
- d. Requests for reimbursement by employees for authorized DRB expenses must be submitted on a properly completed:
 - 1. *SI 3153, Smithsonian Miscellaneous Reimbursement Voucher*, for DRB expenses incurred within the local area and paid with travel cards or personal funds/charge cards, or
 - 2. Travel Voucher for DRB authorized expenses incurred during travel on official SI business and paid with travel cards
- e. Forms SI 3153 and Travel Vouchers must be completed, citing proper funding sources, and submitted through employees' chains of command to the Office of the Comptroller (OC) for reimbursement in accordance with Chapter 5.0 of this handbook.

CHAPTER 5.0: Requests for Reimbursement for DRB Expenses

Employees who use cash or their travel charge cards to pay authorized DRB expenses are required to comply with the vouchering and reimbursement process described below.

5.1 DRB Expenses Incidental to Travel on Official Smithsonian Business

Charges to employee travel cards are not centrally billed to the SI. Cardholders will receive a bill from JPMorgan Chase each month that must be paid in full by the due date cited on the monthly statement. DRB expenses must be pre-authorized and annotated on travel authorizations. Such expenses must be supported by receipts for the actual expenses and submitted for reimbursement on properly completed travel vouchers within five (5) workdays after completion of travel, or every thirty (30) calendar days if on continuous travel. Travel vouchers must reflect:

- a. Travel Authorization number;
- b. Actual dates the expenses were incurred;
- c. Names of individuals participating in the activity;
- d. Brief description of the DRB event;
- e. Merchant receipts for payment; and
- f. Proper financial coding for DRB expenses incurred.

When expenses involve meals, only meals Smithsonian employees deemed essential to the business promotion/discussion maybe reimbursed. The traveler and other Smithsonian employees in travel status who participate in the meal must adjust their daily Meals and Incidental Expenses (M&IE) allowance for each meal attended that is paid for by the individual authorized to incur the DRB expense.

5.2 DRB Expenses Incurred in the Local Area

Reimbursement for actual DRB expenses that are preauthorized and paid with cash or expanded use travel cards must be requested on a properly completed SI 3153, Smithsonian Miscellaneous Reimbursement Voucher. Properly completed forms SI 3153 must be received at OC within thirty (30) calendar days after the expenses are incurred. Employees authorized to use their travel cards within the local area should properly complete and submit SI 3153 forms within five (5) workdays of the date expenses are incurred to ensure timely reimbursement and payment of their Travel Card monthly statements. All reimbursement requests must reflect:

- a. Dates the expenses were incurred;
- b. Names of individuals participating in the activity;
- c. Brief description of the DRB event;
- d. Merchant receipts for payment; and
- e. Proper financial coding for the DRB expenses incurred.

When expenses involve meals, only meals for Smithsonian employees deemed essential to the business promotion/discussion may be reimbursed. Smithsonian employees who are in travel status and participate in the meal are required to adjust their daily M&IE allowance for each meal attended and paid for by the individual authorized to incur the DRB expense.

CHAPTER 6.0: Administration and Management Oversight

6.1 Administration

The Director, OCon&PPM, is assigned responsibility for administration of the process for notifying individuals when they are approved for expanded use of their travel cards and management oversight of compliance with the procedures to the Charge Card Program Manager. The Charge Card Program Manager monitors the use of travel cards and reports on all card usage, including their use for DRB expenses. The Charge Card Program Manager shall notify each employee who is authorized to use their travel card to pay authorized DRB expenses, either when traveling on official SI business or within the commuting areas of their permanent duty station (local area).

Important: Only those employees who receive written authorization from the Charge Card Program Manager may use their travel cards for DRB expenses in the local area. Use of the card without authorization and/or failure to pay the travel card bill in full by the due date may result in suspension or cancellation of an individual's travel card, and appropriate disciplinary or adverse action taken by Smithsonian management.

6.2 Smithsonian Leadership and Unit Directors

SI Leadership and Directors of the museums, research centers and offices shall ensure that:

- a. All requests for expanded and one-time uses of travel cards by employees for DRB expenses are submitted to the Charge Card Program Manager through proper chains of command.
- b. Written explanations are obtained from travel cardholders and are made part of administrative files when a request for reimbursement for DRB expenses has not been preauthorized, or is not supported by merchant receipts of payment and/or supporting details.
- c. That all necessary action is taken immediately by cardholders to resolve disputed charges with JPMorgan Chase and employees are referred to the Charge Card Program staff for necessary assistance.
- d. Forms SI 3153 are prepared and submitted to OC for reimbursement of DRB expenses incurred in local area within five workdays of purchase, and proper funding sources are indicated therein.
- e. All travel vouchers are prepared for reimbursement of approved DRB expenses incurred while employees are in travel status and submitted to OC within five (5) workdays after travel has ended, or every thirty (30) calendar days during continuous travel, and proper funding sources are indicated therein.

6.3 Travel Cardholders

All SI employees who are authorized to use their travel cards to pay authorized DRB expenses shall be accountable for:

- a. Safeguarding their assigned travel cards and account numbers at all times;
- b. Not authorizing any other individual to use their assigned cards or account numbers;
- c. Using their travel card for DRB expenses only when and as authorized;
- d. Ensuring all DRB expenses are preauthorized by their museum, research center or office Director, or his/her approving official or their designee, prior to actually incurring expenses, and funds are available and their use is in conformance with SD 323 and the accompanying *Use of Funds Handbook*
- e. Obtaining receipts for all DRB expenses paid with their travel cards and providing supporting details concerning the expenses when required or requested;
- f. Ensuring action is taken immediately to resolve disputed travel card charges with JPMorgan Chase and obtaining necessary assistance from the Charge Card Program staff, OCon&PPM, when needed;
- g. Properly completing forms *SI 3153, Smithsonian Miscellaneous Reimbursement Vouchers*, for reimbursement of authorized DRB expenses incurred within the local area and submitting them to OC within five workdays of purchase, and ensuring that proper funding sources are indicated therein.
- h. Preparing all travel vouchers that include requests for reimbursement of DRB expenses approved and incurred while traveling on official SI business, submitting travel vouchers to OC within five (5) workdays after travel has ended or every thirty (30) calendar days during continuous travel, and ensuring that proper funding sources are indicated therein.
- i. Promptly paying their JPMorgan Chase travel card account in full each month and by the due date cited on the monthly statement; regardless of the status of expense reimbursement requests.
- j. Providing supporting documentation for DRB expenses such as, emails, copies of pre-authorization approvals, *OCon 501, Field Expense Review and Authorization* forms, travel vouchers, and merchant receipts for DRB expenses paid when requested by internal and external authorities.

6.4 Misuse or Abuse of Authority to Use Travel Cards for DRB Expenses

Use of travel cards to incur and pay DRB expenses shall be monitored by the Charge Card Program, OCon&PPM. On a daily basis, Charge Card Program staff monitors myriad activities through JPMorgan Chase reports and transactional data-mining, and shall periodically conduct management reviews of unit records. The Charge Card Program staff is required to report any detected misuse of travel cards for unauthorized expenses to the appropriate Unit Director, Under Secretary, Chief Financial Officer and/or the Chief of Staff, OS, or the Office of the Inspector General. Cardholders who use their travel cards for unauthorized purposes, or who fail to pay their bill in full each month by the due date, are subject to having their travel card suspended or cancelled and appropriate disciplinary action taken.

SD 322, Charge Card Program

Desk Reference

Part 2 — Purchase Card Program



Smithsonian Institution

**Office of the Under Secretary for Finance
and Administration/Chief Financial Officer
Office of Contracting
and Personal Property Management**

WHERE TO GO FOR HELP

There are several offices that are involved in the purchasing process. Below are the main phone numbers or individuals to contact:

Office of Contracting and Personal Property Management (OCon&PPM)

General Inquiries	OCon&PPM Help Desk — (202) 633-7410
General Inquiries	OCon&PPM Email — OConHelp@si.edu
OCon&PPM Website	http://prism.si.edu/ocfo/ocon/ocon.htm
Main OCon&PPM Phone Number	(202) 633-7290
Charge Card Program Manager	Robert Tanner — (202) 633-1739
Charge Card Program Staff	Nikki Spencer — (202) 633-7296
.....	Vincent Shippy — (202) 633-1737

Office of Comptroller (OC)

Main OC Phone Number	(202) 633-7200
Email	OCHelp@si.edu
OC Website	http://prism.si.edu/ocfo/oc/oc.htm

Office of the Chief Information Officer (OCIO)

PeopleSoft (ERP) Support	OCIOHelpdesk@si.edu
PeopleSoft (ERP) Telephone Support	(202) 633-4000
PeopleSoft Information	http://prism2.si.edu/systems/erp_fin/

Purchase cardholder's may contact JPMorgan Chase (JPMC) directly speak with a customer service representative on any of the following issues: obtain account's available balance, report a lost or stolen credit card, seek information on a declined transaction, obtain basic dispute procedures, confirm recent transactions, or request copies of account statements. Cardholder should always have their basic account information available during calls to JPMC.

JPMorgan Chase (JPMC)

Cardholder Inquires	(888) 297-0781
Collect/Toll Free Calling	(847) 488-4442
Fraud Department/Lost or Stolen Card	(888) 297-0778
Cardholder Dispute — Fax Number	(866) 865-2298

Office of the Inspector General (OIG)

Main OIG Phone Number	(202) 633-7050
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<p style="text-align: center;">Purchase Card Program</p> <p style="text-align: center;">Purchase Cardholder and Approving Official Training</p>

TABLE OF CONTENTS

WHERE TO GO FOR HELP	i
CHAPTER 1.0: Introduction.....	1
1.1 Purpose.....	1
1.2 Objectives	1
1.3 Training Required for Purchase Cardholders and Approving Officials	2
CHAPTER 2.0: The Smithsonian Purchase Card Program	3
2.1 JPMorgan Chase (JPMC) Bank	3
2.2 Smithsonian Purchase Card Program Structure	3
CHAPTER 3.0: Cardholder and Approving Official	5
3.1 Purchase Cardholder Responsibilities.....	5
CHAPTER 4.0: Using the Purchase Card	8
4.1 General Overview	8
4.2 Purchase Card Spending Limitations.....	10
4.3 Merchant Category Codes.....	11
4.4 Authorized and Unauthorized Uses of the Purchase Card.....	11
4.5 Recordkeeping	14
4.6 Reconciliation, Disputes, and Payments.....	15
4.7 Card Security	18
4.8 Administrative Actions	20
CHAPTER 5.0: The Purchasing Process	23
5.1 Overview of the Purchasing Process.....	23
5.2 Micro-Purchase and Other Acquisitions Procedures	24
5.3 Priority Sources for Supplies and Services	25
5.4 GSA Contracts and Supply Sources	25
5.5 Smithsonian Institution-Wide Agreements.....	28
5.6 Open Market Purchases	29
5.7 Finding Vendors.....	31
5.8 Purchasing Methods.....	32
5.9 Writing a Statement of Work.....	33

TABLE OF CONTENTS

5.10	Soliciting Quotes.....	34
5.11	Questions to Ask When Soliciting Quotes.....	35
5.12	Evaluating the Quote and Selecting a Vendor—Lowest Price or Best Value	36
5.13	Receiving, Inspection and Acceptance Using the Purchase Card.....	37
5.14	Non-Expendable Personal Property	37
CHAPTER 6.0:	Purchase Card Reconciliation and Reallocation in PeopleSoft	40
6.1	Purchase Card Module in the Enterprise Resources Planning (ERP) system (the SI Financial System).....	40
6.2	Logging into ERP	41
6.3	Accessing Purchase Card Statements	44
6.4	Reallocating Transactions.....	47
6.5	Verifying/Approving Purchase Card Statement	51
6.6	Handling Disputed Items	53
6.7	Distribution Template Feature	53
6.8	Procurement/Travel Card Report.....	55
6.9	Logging Out of PeopleSoft	59
CHAPTER 7.0:	Additional Purchase Card Queries and Reports in ERP	60
7.1	Accessing Current Purchase Card Transactions in ERP Staging Table	60
7.2	Accessing Prior Purchase Card Statements	61
7.3	Accessing Purchase Card Transaction Detail by Chartfield	64
7.4	Reviewing Personal Property Purchases and Expenses.....	66
7.5	Reviewing Purchase Card Details for Non-Purchase Cardholders and Approvers.....	68
7.6	Obtaining Purchase Card Voucher Information for Service Requests for Post-Voucher Funding Changes	70
Exhibit 322-2-A:	Completing the JPMorgan Chase Purchase Card Application	72
Exhibit 322-2-B:	JPMorgan Chase Purchase Card Application	73
Exhibit 322-2-C:	Applications for Purchase Cardholder and Approving Official Authority	74
Exhibit 322-2-D:	Approving Official Application and Instructions	75
Exhibit 322-2-E:	Request to Waive Restriction on the Use of Purchase Cards to Acquire Sensitive Personal Property Items	76
Exhibit 322-2-F:	JPMorgan Chase Dispute Form	77
Exhibit 322-2-G:	Purchase Card Transaction Log	78

CHAPTER 1.0: Introduction

1.1 Purpose

This *Purchase Card Program Desk Reference* provides all Smithsonian Institution (SI) employees information about the purchase card program policies and procedures, including how employees are delegated purchase Cardholder and Approving Official authority. Sections of this *Desk Reference* contain information specifically directed to employees who may be nominated for or already delegated purchase cardholder or approving official authority. Therefore, this *Desk Reference* is also the *Purchase Cardholder and Approving Official Training Manual*.

1.2 Objectives

1.2.1 For All Employees

Copies of this *Desk Reference* shall always be available to employees on the OCon&PPM Forms and Reference website on Prism to ensure that employees have access to:

- The policies and procedures for using purchase cards
- Guidance on the roles and responsibilities of purchase Cardholders and Approving Officials
- Up-to-date information regarding the terminology and forms commonly used in the Smithsonian purchase card program
- Information on how administrative costs and purchasing lead times are alleviated

1.2.2 For Purchase Cardholders and Approving Officials

This *Desk Reference* is used during the training classes conducted by the Office of Contracting and Personal Property Management (OCon&PPM), for employees who may be nominated for delegations of Cardholder and Approving Official authority receive instruction on how to appropriately exercise the authority they may receive. Instructions are also provided use of SI Enterprise Resources Planning (ERP) system to:

- Access purchase card statements online
- Reallocate purchase card transactions
- Verify or approve monthly transactions depending on one's role in the purchase card process

1.3 Training Required for Purchase Cardholders and Approving Officials

1.3.1 Purchase Cardholder and Approving Official Training

A *Purchase Cardholder and Approving Official Training* class is required for all employees nominated to be a purchase Cardholder or Approving Official. Employees delegated purchase Cardholder and Approving Official authority must complete refresher training every three years. Information on OCon&PPM-sponsored training classes and schedules is available on Prism from the Office of Human Resources, [Training and Employee Development website](#) under SI Courses and Contracting and Procurement.

1.3.2 Introduction to SI ERP Financials

In order for purchase Cardholders and Approving Officials to obtain an ERP User ID they must complete an *Introduction to SI ERP Financials* class taught by the Office of the Comptroller (OC). The SIERP, commonly referred to as PeopleSoft, is used to monitor purchases completed with purchase cards, reconcile account information, change chartfields or accounting distribution codes for purchases, and request reports. .

The SIERP classes are listed on the [ERP Home Page](#) on Prism under Training. A copy of the SI ERP Financials [Security Form: Purchasing](#) is also available on the ERP Home Page on Prism under Forms and is required to obtain an ERP User ID.

CHAPTER 2.0: The Smithsonian Purchase Card Program

The Smithsonian Institution (SI) participates in the Government-wide commercial purchase card program. The purchase card is the primary method for making purchases of \$3,000 or less (micro-purchases).

2.1 JPMorgan Chase (JPMC) Bank

General Services Administration (GSA) awarded master contracts for the Government charge card program. The Smithsonian uses a MasterCardTM branded card issued by JPMorgan Chase (JPMC) Bank. The JPMC-issued cards are similar in appearance to personal credit cards and the following insignia and information are clearly visible on the cards:

- The Seal of the United States of America
- “For Official U.S. Government Purchases Only”
- “U.S. Government Tax Exempt”

2.2 Smithsonian Purchase Card Program Structure

The Office of Contracting & Personal Property Management (OCon&PPM) is responsible for management and oversight of the Smithsonian Purchase Card Program. The Office of the Comptroller (OC) is responsible for receipt and payment of purchase card invoices.

2.2.1 Director, Office of Contracting and Personal Property Management

The Director, OCon&PPM, is designated and delegated authority from the Secretary to serve as the Institution’s principal Contracting Officer. The Director, OCon&PPM, is responsible for assuring purchase card program management and oversight occurs.

2.2.2 Charge Card Program Manager, OCon&PPM

The Director, OCon&PPM, has delegated program authority to the Charge Card Program Manager, who is also the principal **Agency/Organization Program Coordinator (A/OPC)** for the Smithsonian Charge Card Program, and responsible for:

- a. Serving as the Smithsonian liaison to external agencies that oversee charge card programs Government-wide
- b. Providing day-to-day management and administrative oversight of the Smithsonian Purchase Card Program
- c. Delegating and rescinding purchase Cardholder and Approving Official authority
- d. Establishing and enforcing purchase cardholder spending limits
- e. Issuing delegations of authority to employees approved to be purchase cardholders or approving officials
- f. Conducting training for approving officials, cardholders, and other employees on the Purchase Card Program policies and procedures

- g. Maintaining up-to-date lists of Cardholders and Approving Officials
- h. Monitoring transactions, disputes, and fraudulent activity, and making reports to the Director, OCon&PPM, and senior management
- i. Conducting reviews of the Purchase Card Program and use of purchase cards

2.2.3 Directors of Smithsonian Museums, Research Centers and Offices

Unit Directors nominate permanent Smithsonian employees who have completed a *Purchase Cardholder and Approving Official Training* class, to support unit procurements activities for which use of purchase cards are authorized. Nominations must be submitted on a *Government Purchase Card Setup Form* and an *OCon 400, Application for Delegation of Purchase Cardholder and Approving Official Authority* form, (see Exhibit 322-2-C).

2.2.4 Approving Officials

Approving officials should be funds control officers or administrative officers who would typically approve purchases for their units. They are responsible for the day-to-day purchase card activities within their unit. Approving officials work with the cardholders for whose transactions they approve and the Charge Card Program Manager. Generally, approving officials may not be responsible for oversee and approving transactions completed by more than seven purchase cardholders.

An approving official may not approve (1) their own purchases, if they are also a purchase cardholder, or (2) approve purchases by a cardholder who is their supervisor.

2.2.5 Purchase Cardholders

A purchase cardholder is nominated by their unit director to support unit procurement needs. The purchase card is issued in the cardholder's name and may only be used by the cardholder. No other person should have access to the card account number nor use the card.

2.2.6 Office of the Comptroller (OC)

- Approves requests for access to PeopleSoft (the SI ERP financials system)
- Receives invoices and makes payments

CHAPTER 3.0: Cardholder and Approving Official

3.1 Purchase Cardholder Responsibilities

3.1.1 Upon receipt of the card, the cardholder must:

- Verify the proper spelling of the cardholder name
- Sign the signature strip on the back of the card (as embossed on the front)
- Call the toll-free number on the activation notice and provide the information requested to verify receipt

3.1.2 Safeguarding Assigned Cards and Documentation

- Cardholders must store purchase cards in a secured location to prevent unauthorized charges and access to account numbers.
- To report lost or stolen cards Cardholders must contact JPMC at (888) 297-0778, their Approving Official, and the Charge Card Program Manager, OCon&PPM.
- Cardholders must notify their Approving Officials and the Charge Card Program Manager of any changes to the account (for example, the Cardholder's name or telephone number changes, card is lost, etc.)

3.1.3 Proper Use of the Purchase Card and Recordkeeping

- Cardholders are responsible for adhering to the policies and procedures contained in this *Desk Reference* and other applicable policies and procedures, e.g., personal property management procedures.
- Approval for purchases is obtained in accordance with unit and funds control procedures.
- Cardholders shall make purchases within authorized funding, purchase, and usage limits. **Note:** If an inappropriate or unauthorized purchase is made, cardholders may be asked to personally reimburse these expenses.
- Cardholders must ensure that prices:
 - Do NOT include sales tax
 - Include applicable trade discounts (for example, price breaks for ordering in greater quantities)
- Ensure manufacturer/retailer rebates or discounts are made payable or endorsed to the Smithsonian Institution
- Document each purchase on the Purchase Card Transaction Log at the time the purchase is made. A sample Purchase Card Transaction Log is included as Exhibit 322-2-G.

- Record the date goods and services are received on the Purchase Card Transaction Log.
- Maintain required documentation to support purchase card transactions: sales and/or purchase card receipts, shipping/ packing lists; invoices for purchases; credits for returned items and any other appropriate or SI-required documentation/approvals.
- Purchases of Personal Property
 - Sensitive Personal Property Items: If a waiver is granted by OCon&PPM to allow the purchase of a sensitive item (see [SD 315, Personal Property Management](#)) a staff member *other* than the cardholder must sign the Purchase Card Transaction Log or shipping/packing slip **and** indicate the date the item was received. For a listing of sensitive items, see page [38](#). Once the sensitive item is received, the cardholder must notify the appropriate unit Accountable Property Officer (APO) to ensure items are tagged and added to the SI property inventory.
 - Weapons and Ammunition: (e.g., firearms, bullets, spears, dart guns, and similar tranquilizer and projectile devices) are considered sensitive and accountable regardless of dollar value. They may not be purchased with a purchase card, unless approval has been granted in writing by the Office of Protection Services and the purchase coordinated with the Charge Card Program staff. See Ammunition and Weapons, on the [OCon 6, Restrictions on Purchasing List](#).
- Reconcile the Purchase Card Transaction Log to the purchase card transactions listed in PeopleSoft within the time period designated by the Charge Card Program Manager. This is generally two weeks after the cycle end date. Cardholders need to change the status of the transactions from “staged” to “verified” in PeopleSoft indicating that the transaction has been reviewed and reconciled. Charges must be reallocated to correct chartfields at that time. Cardholders will receive an email notice each month from the charge card program staff advising them of the date by which statements must be reviewed, reconciled, and verified in PeopleSoft. Unit administrative staff may establish reconciliation due dates earlier than that required by OCon&PPM to meet unit administrative needs. For more information, refer to Chapter 6.0, Purchase Card Reconciliation and Reallocation Procedures.
- Review and sign the monthly paper statement received from JPMC. The paper statement is identical to the monthly charges displayed in PeopleSoft and retained and filed with the required purchase card documentation.
- Immediately notify JPMC of any billing discrepancies posted on the account.

3.2 Approving Official Responsibilities

Purchase card transaction Approving Officials must:

- Review the Purchase Card Transaction Log for each cardholder on a monthly basis to verify that reconciliation was performance there is adequate documentation exists for each purchase.
- Confirm all purchases made by the cardholder were necessary, consistent with requirements of the funding source, and within available funds. Approves cardholder charges each month in PeopleSoft within the time period designated by the Charge Card Program Manager. Approving officials must change the status of all transactions, including FedEx charges, from “staged” or “verified” to “approved.” If approvals are not performed in PeopleSoft, unit senior managers will be notified. Continued non-compliance of this responsibility may result in suspension or cancellation of purchase cards, or revocation of approval authority. For more information please refer to Chapter 6.0, Purchase Card Reconciliation and Reallocation Procedures.
- Review and sign the cardholder’s monthly paper statement received from JPMC. (The paper statement should be identical to the statement viewed in PeopleSoft.)
- Remind cardholders that accountable and sensitive property purchased must be tagged in accordance [SD 315](#) and reported to the unit APO.
- Review cardholder transactions and ensure they are reallocated to the appropriate chartfield in PeopleSoft, otherwise, the transactions will be charged to the default chartfield associated with the purchase card. If an approving official is not the funds control person for the cardholder, he/she coordinate with the appropriate unit personnel to ensure proper reallocation occurs.
- Verify on at least a semi-annual basis that cardholders are in possession of their cards.
- Submits requests to the Charge Card Program Manager to adjust purchase transaction and monthly usage limits; and renew or cancel purchase cards especially when the cardholder leaves the Smithsonian and/or the Unit.
- Serve as liaison between the Charge Card Program Manager and the cardholder, including disseminating information to the cardholder and providing guidance and assistance when necessary.
- Report any misuse of the card to the Charge Card Program Manager.

CHAPTER 4.0: **Using the Purchase Card**4.1 **General Overview**

Although the process may vary slightly at each unit, the following steps give a general overview of the purchase card transaction process:

- Identify the purchase requirement
- Review the list of Authorized/Unauthorized Uses of the Purchase Card (see Table 322-2-1) and the [OCon 6, Restrictions on Purchasing List](#) (the current version of the OCon 6 is on the [OCon&PPM Forms and Reference webpage](#) on Prism under Procurement Information)
- Identify potential sources
- Obtain pricing to include shipping, and ensure purchase is within the purchase card limits. If not, check with the approving official on how to proceed
- Ensure funds availability and obtain approval in accordance with unit administrative and funds control procedures an
- Make the purchase by telephone, via the Internet, or over the counter. Provide Tax ID forms upon vendor request (obtain forms on the [OC Forms Library tab](#) on Prism), and then annotate the purchase on the Purchase Card Transaction Log (see Exhibit 322-2-G).
- Enter the date the order or service is received on the Purchase Card Transaction Log.
- Obtain SI tags upon receiving sensitive property purchased (see page [38](#) for additional guidance)

A default chartfield (accounting information) is associated with each purchase card. Purchase transactions requiring reallocation or redistribution must be done in PeopleSoft during the monthly reconciliation process. Both the cardholder and the approving official are able to reallocate transactions. The approving official is ultimately responsible for approving the final reallocation. See Chapter 6.0 for more information on reallocation in PeopleSoft.

IMPORTANT: Multiple deliveries or back ordering by the merchant should be avoided.

4.1.1 **Telephone Orders**

For telephone orders, cardholders should:

- Contact the merchant and relay all pertinent information to the merchant, including the item description, quantity, and shipping address (specify “inside delivery” for items delivered directly the unit).
- Inform the merchant that the purchase is for "official Smithsonian Institution business" and is not subject to state or local sales tax. Pay sales tax only if the

merchant refuses to waive it. Confirm that the merchant's price includes delivery and the order will be delivered within 30 days. Provide the merchant with the card number and expiration date. For card verification purposes the merchant may request a card verification value (CVV). This three-digit number is printed on the signature panel on the back of the card immediately after the card account number.

- Instruct the merchant to provide a packing slip or other shipping document.
- Document the purchase in the Purchase Card Transaction Log.
- Upon receipt of the order, inspect and verify order accuracy including quality, quantity, and price when merchandise arrives. **NOTE:** If the item is a sensitive item, someone other than the cardholder must perform this function.
- Retain shipping documents and receipts received with the merchandise.
- Record the date the goods or services are received on the Purchase Card Transaction Log.

NOTE: A telephone order may be picked up by another employee, provided: (1) the order has been previously placed by a cardholder, and (2) the sales receipt or packing slip is obtained and provided to the cardholder.

4.1.2 Internet Orders

For Internet Orders, the cardholder should:

- Locate the merchant's website.
- Review the merchant's terms and conditions prior to completing the order.

NOTE: The cardholder should always check to determine if the website being accessed is secure before entering the purchase card account number. If not, the cardholder should not use the site. A secure site is normally identified by a closed "lock" symbol in the lower left hand corner of the screen. Check the Internet browser software and any information posted on the website that is being accessed for more information regarding the level of security provided.

- Purchase goods/services. Enter the card number and expiration date. Some websites will recognize that the purchase is tax exempt. If not, indicate that the purchase is tax exempt and provide the SI tax exemption number. Pay sales tax only if there is no way to inform the merchant to waive it.
- Relay all pertinent information to the merchant (for example, the cardholder's name and email address, item description, quantity, and shipping address). If available, the cardholder should print the electronic order confirmation for his or her files. For card verification purposes the merchant may require a card verification value (CVV). This three-digit number is printed on the signature panel on the back of the card immediately after the card account number.

- Document the purchase in the Purchase Card Transaction Log.
- Upon receipt of the order, inspect and verify order accuracy including quality, quantity, and price when merchandise arrives. **NOTE:** If the item is a sensitive item, someone other than the cardholder must perform this function.
- Record the date the goods or services are received on the Purchase Card Transaction Log.
- Retain shipping and invoicing, documents received with merchandise.

4.1.3 Over-the-Counter Purchases

For over-the-counter purchases, the Cardholder must:

- Inform the merchant that the purchase is for “official Smithsonian Institution business” and is not subject to state or local sales tax. Pay sales tax only if the merchant refuses to waive it. Provide the merchant with the purchase card.
- Upon receipt of the order, inspect and verify order accuracy including quality, quantity, and price when merchandise arrives. **NOTE:** If the item is a sensitive item, someone other than the cardholder must perform this function.
- Retain the receipt (for example, cash register receipt or purchase card charge slip).
- Document the purchase in the Purchase Card Transaction Log.

4.2 Purchase Card Spending Limitations

A purchase or spending limit addresses how much may be purchased. Under no circumstances may a cardholder complete a purchase that costs more than the maximum amount of his or her delegated purchase cardholder authority. Use of the purchase card by a cardholder is subject to a single purchase limit and a billing cycle limit.

4.2.1 Single Purchase Limit

The single purchase limit is the dollar amount cited in purchase cardholder delegations of authority which Cardholders may not exceed for individual purchases. A “single purchase” is the total amount, including freight or shipping costs, of items purchased at one time. Typically, the single purchase limit within the Smithsonian Institution is \$3,000. Multiple items may be purchased at one time using the card; however, no single purchase may exceed the authorized single purchase limit. Any transaction over a cardholder’s single purchase limit will be declined by JPMC.

IMPORTANT: Splitting a transaction to stay within the single purchase limit is a violation of Smithsonian policy. For example, a cardholder’s single purchase limit is \$3,000. If the items purchased total more than \$3,000, the cardholder may not divide

the purchase into several charges (either placed with the same merchant or two different merchants) to stay within the authorized single purchase limit. Purchases that exceed the single purchase limit should be processed in PeopleSoft as purchase orders.

4.2.2 Billing Cycle Limit or Monthly Limit

The billing cycle limit (also called the monthly purchase limit) is the maximum total dollar amount a cardholder is authorized to spend each billing month with the card. The SI billing cycle runs from the 26th of the month to the 25th of the following month. Typically, the billing cycle limit for cardholders is \$10,000. Any transaction attempted over the billing cycle limit will be declined by JPMC. Where purchasing needs necessitates a billing cycle limit greater than \$10,000, the cardholder's Approving Official should submit a written request to the Charge Card Program Manager.

4.2.3 Usage Limits

A usage limit addresses *what* may be purchased. It is generally based on: (1) Merchant Category Codes identified by the Charge Card Program Manager, and (2) conditions for use of the purchase card. Smithsonian does have several Merchant Category Codes which are not authorized.

4.3 Merchant Category Codes

Each purchase card is restricted by Merchant Category Codes (MCCs) which cover the types of goods and services that a cardholder is authorized to purchase. If the cardholder attempts to use the purchase card with a merchant whose code has not been authorized (for example, MCC-7995 — Betting/Casino Gambling), the transaction will be declined by JPMC.

4.4 Authorized and Unauthorized Uses of the Purchase Card

Cardholders shall use their purchase cards to complete *authorized* transactions necessary to obtain goods and services for use by, and benefit to, only the Smithsonian Institution (SI). Purchase card transactions are subject to all applicable federal regulations and SI procurement policies, including [OCon 6, Restrictions on Purchasing List](#), available from the [OCon&PPM Prism website](#) under 'Procurement Information,' as well as other guidance documents cited herein.

IMPORTANT: When the cost of annual requirements for ongoing services or repetitive purchases required from a single merchant is expected to exceed \$10,000, unit managers and procurement officers should consider competitively establishing unit blanket (UB) agreement(s) with merchants that will accept purchase card payments for delivery orders.

The Charge Card Program staff is available to answer questions via telephone at (202) 633-7410 or email message to OConHelp@si.edu.

Table 322-2-1: Authorized/Unauthorized Uses of the Purchase Cards

Purchase Cardholders Are AUTHORIZED to Use Their Purchase Cards for the Following Types of Purchases:	
•	Commercially available goods (for example: office, computer and scientific equipment or supplies)
•	Commercially available services that do not require commercial general liability insurance or involve rights in data issues (for example: printing and duplication, copier maintenance, cell phone monthly payments, custodial services, shipping)
•	Image purchases when a Licensing Agreement has been reviewed and approved by an individual with delegated authority to approve such purchases
•	Catered food and beverage purchases for SI guests at public events or for development functions held on-site (including pick-up or delivery) at/to SI locations. Cardholders shall verify that selected caterers have liability insurance in amounts that meet SI requirements prior to completing purchase card transactions. Food and beverage purchases shall be authorized by unit approving officials who shall ensure that appropriate funds are used. Unit staff and purchase cardholders are encouraged to review the current guidance as contained in SD 323-Spending Policy for Federal Appropriations and Trust Funds (1/25/2010) and the accompanying Use of Funds Handbook released in May 2012. Unit staff and purchase cardholders should contact the OPMB analyst designated for their unit when clarification of the information in either of the new guidance documents is required. Use of federal funds for food/catering/fundraising expenses is generally not authorized.
•	Meeting and conference rooms (on a short-term basis up to 180 days)
•	Metro Cards for local bus/subway between SI locations
•	Parking for Smithsonian-owned or leased vehicle
•	Training and conference registration (employees may NOT be reimbursed for meals included with a registration fee)
•	Payments for memberships and subscriptions — must be in the unit's name (not for an individual)
•	Purchases from Priority Sources including the Federal Prison Industries (FPI), AbilityOne Program, GSA stock and GSA Federal Supply Schedule contractors

Table 322-2-1(continued): Authorized/Unauthorized Uses of the Purchase Cards

Purchase Cards SHALL NOT Be Used for the Following UNAUTHORIZED Uses:	
•	Goods or services on the OCon&PPM Restrictions on Purchasing List (OCon 6) that have not been approved by the appropriate clearance office or those that shall be purchased only by OCon&PPM
•	Commercially available services that require commercial general liability insurance or involve intellectual property/rights-in-data issues
•	Sensitive personal property is non-capitalized personal property items considered highly vulnerable to pilferage, inappropriate use, and/or inappropriate disposal, and may present serious liability to the SI if lost and misused. Sensitive Personal Property — Regardless of Acquisition Costs: Weapons (Firearms, spear, dart, similar tranquilizing and projectile devices), Motor vehicles (transportation equipment, automobiles, motorcycles, trucks, vans, motorized carts, boats, ships), portable computers (laptops, tablet PCs, net-books, “mini” desktops, handheld bar-code readers and equivalent items), and computer servers. Sensitive Personal Property — Acquisition Costs of \$1,000 or Higher: camcorders, cameras, copiers, fax machines, desktop scanners and printers, and projectors, (when not permanently mounted). See SD 315, Personal Property Management, Chapter 4.0.
•	Capitalized personal property with an acquisition cost of \$5,000 or more. (See the Personal Property Management Manual (SD 315) Chapter 4.0.)
•	Cash advances (at ATMs or otherwise) and/or travel advances
•	Gift Cards, stored-value, credit, or any other type of third-party payment product
•	First-Aid Kits which contain any type of analgesic such as aspirin, acetaminophen, or non steroidal anti-inflammatory drug (NSAID)
•	Meals, food or beverages for SI employees, UNLESS approved in advance by the Charge Card Program Manager, OCon&PPM
•	Expenses for reception and representational expenses other than authorized catering services. Reception and representational expenses include those related to business and development activities such as hosting or entertaining individuals from other governmental, public or private organizations who are current or potential SI donors or business associates. Example expenses are restaurant charges or event tickets
•	Travel related expenses for SI employees, contractors and/or invitational travelers, including transportation, meals, lodging, or subsistence costs. For SI employees on travel, the Government Travel Card shall be used for <u>all</u> official out-of-area travel-related expenses. The card may not be used to hold or reserve lodging.
•	Personal use. Items purchased with the purchase card are for official Smithsonian use only. Purchase cards shall not be used for personal purchases, or used as identification for personal purchases (for example, while paying for a personal purchase by check).
•	Advance payment to a merchant prior to shipment of goods or receipt of services unless authorized by law (for example, purchase cards may be used for unit subscriptions, registration fees, and training)
•	Museum specimens, works of art and other objects for the SI collections
•	Employee Incentive/Recognition Awards (except SI Service Pins or plaques), including Interns and Volunteers
•	Gifts to SI staff, interns and/or volunteers, regardless of purpose, UNLESS approved in advance by the Charge Card Program Manager, OCon&PPM
•	Rental of storage lockers or warehouse storage facilities regardless of time period
•	Parking tickets, fines, and any related towing, even for SI vehicles
•	Bottled water or water cooler rentals unless specifically authorized in writing by OSHEM
•	Purchases over the single transaction limit (\$3,000) not authorized by OCon&PPM
•	Transactions shall not be split into smaller buys to circumvent the dollar limitation for single transactions

4.5 Recordkeeping

4.5.1 Documentation and Retention Procedures

Anytime the purchase card is used, the cardholder must document the purchase on the Purchase Card Transaction Log. This practice ensures the log is kept in a chronological manner. Most units do not enter the purchase directly in People Soft. No unit other than the Office of the Comptroller makes payments to JPMC for purchase card transactions.

Cardholders must obtain a merchant record of the transaction (receipt or invoice) which will differ depending upon the method of ordering:

- Telephone purchases — cardholders must retain the shipping documents associated with the order, or a customer copy of the charge slip when the purchase is for services.
- Internet purchases — the cardholder should print the electronic confirmation associated with the order.
- Over-the-counter purchases — cardholders must obtain a customer copy of the charge slip.

Once the purchased items are received, indicate the date the item was received on the Purchase Card Transaction log. For sensitive items someone other than the cardholder or individual who requested the purchase must sign the Purchase Card Transaction Log to attest receipt of the sensitive item(s). **Reminder:** Sensitive items may not be purchased using the PCard unless an *OCon 410, Request to Waive Restriction on the Use of Purchase Cards to Acquire Sensitive Personal Property Items*, form is approved by Charge Card Program Manager in advance of purchase.

The Purchase Card Transaction Log entries and merchant records should be used to verify and reconcile the purchases with those that appear online in PeopleSoft each month as well as on the cardholder's monthly paper statement (also called billing statement) that is received from JPMC.

Each unit must establish a system of purchase card records and files so that an audit trail of all purchasing activities is maintained. Some standard elements of purchase card program records and files are:

- Merchant records (described above), copies of warranties, agreements, and any background notes to the file such as determination of fair and reasonable price, if applicable
- Each cardholder's Purchase Card Transaction Log and monthly cardholder statements, filed in order of monthly payment cycle by fiscal year
- Any written instructions given to the vendor, such as a statement of work or purchase description

- When competition is required: price quotes, contractor proposals, sole source justifications, etc. For GSA purchases, any GSA contract information (e.g., schedule numbers and pricelists).

4.5.2 Retention

All documentation related to cardholder purchases must be filed together and retained for three years after final payment. (Remember: where authorized, documentation for procurements involving intellectual property rights or museum collection items using the purchase card must be retained permanently.)

4.6 Reconciliation, Disputes, and Payments

Cardholders and Approving Officials are responsible for reconciling purchases against monthly statements, resolving discrepancies and reporting disputed transactions. Reconciliation should occur by OCon&PPM established deadlines, which is generally two weeks after the statement cycle ends and the purchase card transactions are loaded into PeopleSoft.

4.6.1 Cardholder Reconciliation and Review

The Charge Card Program staff sends an email to Cardholders each month at the end of the billing cycle indicating that purchase card transactions for that cycle are loaded into PeopleSoft. The email also specifies the deadline for which reconciliation, verification and approvals must be completed. In addition to the PeopleSoft statement, cardholders will also receive a monthly paper statement from JPMC (usually within seven days of the end of each billing cycle). The two statements (one in PeopleSoft and the paper statement) are identical.

Cardholders must reconcile purchases that appear the paper statement or in PeopleSoft with transactions on the Purchase Card Transaction Log. Reconciliation is indicated in the ✓ column on Purchase Card Transaction Log. The check indicates that the information provided about each transaction is correct.

In addition to reconciling the log to the statement, the transactions must also be reallocated in PeopleSoft and the status should be changed from STAGED to VERIFIED. This must happen within two weeks from the time the statements are first loaded in PeopleSoft. Statements are usually loaded into PeopleSoft two to three days after the billing cycle ends. For more information on the reconciliation process, see Chapter 6.0.

NOTE: When the Cardholder is not available to reconcile the monthly statement, the Approving Official is responsible for ensuring that reconciliation is accomplished. Approving Officials should therefore have access to the Cardholder's Purchase Card Transaction Log and supporting documentation.

The *monthly statement* (Statement of Account) received from JPMC includes the following:

- Statement date
- Cardholder address
- Designated Billing Office (Office of the Comptroller) identifier
- Foreign conversion fee (if applicable)
- Statement of total dollars
- Itemized charge transactions
- Instructions for handling transaction disputes
- Toll-free telephone number to make statement inquiries
- Cardholder's billing cycle, single purchase limit, and cycle limit.

If the cardholder receives an inaccurate statement (for example, merchandise has not been received or the amount billed is incorrect), he or she should (1) attempt to resolve the discrepancy with the merchant and (2) if it cannot be resolved, initiate a dispute action immediately. See Disputes section on the following page for specific instructions.

Once the cardholder reconciles, he or she must sign the JPMC statement and provide it along with purchase log, receipts and related documents to the appropriate approving official for review and signature. This should be kept as a part of the purchasing file.

4.6.2 Approving Official Reviews

Approving Officials are responsible for reviewing Cardholders' records. For each billing cycle, Approving Officials should:

- Compare the purchases on each cardholder's monthly statement to his/her Purchase Card Transaction Log.
- Ensure each purchase has been properly made in accordance with purchase and funding limitations and each purchase has been properly documented in terms of the Purchase Card Transaction Log entry, sales and/or purchase card receipt, and receiving document.
- Resolve discrepancies with the cardholder.
- Review and approve *all* transactions including FedEx charges online in PeopleSoft and ensure necessary fund allocations are made.
- Sign the monthly cardholder statement to acknowledge they have reviewed the information and have complied with their responsibilities as Approving Official.

NOTE: Online approvals are monitored by the Charge Card Program staff. Failure to perform these tasks on a regular basis could result in incorrect funding being applied to transactions and/or improper or undocumented transactions from being detected. The Charge Card Program staff will advise unit management when an Approving Official repeatedly fails to complete online approvals by the established deadlines.

Continued non-compliance of this responsibility may result in suspension or cancellation of purchase cards, or revocation of approval authority. For more information, refer to Chapter 6.0, Purchase Card Reconciliation and Reallocation Procedures.

4.6.3 Disputes

Reasons for disputing a transaction may vary: dissatisfaction with the goods or services provided; goods were defective; or non-recognition of the reported merchant or transaction billed. In all cases, the first course of action is for the Cardholder to contact the merchant and attempt to resolve the dispute directly. In most cases the phone number of the merchant appears as part of the Transaction Description on the cardholder's monthly statement. If attempts to resolve the dispute with the merchant are not successful, or if attempts to contact the merchant are not possible (merchant is not recognized, contact information is not available, etc.), the following process should be initiated by the Cardholder:

Step 1: Call JPMC at (888) 297-0781 or (847) 488-4442 (collect if outside the United States) within 90 calendar days of the posted transaction date of the monthly statement on which the charge first appears. After 90 days, the right to dispute a charge may be relinquished.

Step 2: JPMC will advise the individual making contact about the next steps. The cardholder will normally be required to complete a paper electronic [Dispute Form](#) (see Exhibit 322-2-F) and send the completed form to JPMC. An electronic (fillable) copy of the Dispute form may also be found on the [OCon&PPM website](#) under OCon&PPM Forms and Reference. The cardholder should always keep a copy of the completed Dispute Form for his or her reference and provide a copy of the Dispute form to the Charge Card Program staff in OCon&PPM.

- JPMC: email to CCSColumbusDisputes@chase.com or via fax to (866) 865-2298
- OCon& PPM Charge Card Program: fax to (202) 633-7319

Step 3: JPMC will acknowledge the initiation of a dispute to the cardholder. While the process is taking place, the cardholder is not expected to take any further action, unless JPMC requests additional information.

Step 4: If the charge is resolved in favor of the cardholder, it will be removed from the account. If the dispute is resolved in favor of the merchant, a letter is sent to the cardholder explaining the decision. The cardholder should retain the dispute resolution letter and attach it to the monthly statement as supporting documentation for the reconciliation process.

In the event an unrecognized transaction appears on the purchase card statement and efforts made to verify by receipts or merchant contact fail, the transaction may indicate fraud and will be considered as an unauthorized transaction. In such cases, the cardholder should immediately notify JPMC and follow their guidance. In addition, the cardholder should also notify the Charge Card Program staff of the occurrence and forward copies of any documents sent to JPMC so they may also track and monitor the issue.

4.6.4 Payment

The Office of the Comptroller will pay JPMC's invoices. **Units do not make payments to JPMC** for their purchase card transactions.

4.7 Card Security

Cardholders are responsible for safeguarding their cards, reporting lost or stolen cards, and activating replacement cards.

4.7.1 Safeguarding the Card

Cardholders are responsible for safeguarding their assigned purchase cards and account number at all times. **A cardholder should never allow anyone access to or to use his or her card or account number. The cardholder should never use his/her assigned purchase card to procure personal items.** Keep in mind that paper monthly statements from JPMC reflect the complete account number and should be kept secure as well.

4.7.2 Unsolicited Email Inquiries and Phishing

Phishing is an internet, email or telephone scam that attempts to trick consumers into revealing personally identifiable information (PII) — (see SI Announcement dated Feb. 23, 2009, Smithsonian Data Governance Principles in the Smithsonian Privacy Program Guidance dated Aug. 3, 2011 and [SD 118, Privacy Breach Notification Policy](#) dated June 24, 2010) such as credit or debit account numbers, checking account information, Social Security number, or banking account passwords through spoof websites, unsolicited emails, and telephone calls. Phishing scams are among the fastest growing forms of fraud. Phishing emails and the websites which they reference typically use familiar logos and familiar graphics to deceive recipients into thinking the sender or website owner is a company they know or a Government agency. Sometimes the phisher urges intended victims to confirm account information that allegedly has been stolen or lost. Other times the phisher entices victims to reveal personal information by telling them they have won a special prize or reward.

Look for these red flags in the email or telephone call:

- A predator phisher may ask individuals to provide personal information (e.g.: bank account numbers, account passwords, credit card numbers, PIN numbers, mother's maiden name, and/or Social Security numbers). Please Note: neither JPMC nor MasterCard will ever ask you for this information by email
- The solicitor or solicitation does not address you by your name
- No reference of a company name or associated account numbers provided.
- A warning is provided related to an account closure unless personal or financial information is confirmed.
- A warning stating that you have been a victim of fraud
- Spelling or grammatical errors

Take these steps to minimize phishing risk:

- View any email or telephone request for financial information or other personal data with suspicion
- Do NOT reply to the email and do NOT respond by clicking on a link within the email message
- Call or visit in person or via website of the business in question (usually provided on monthly statements).
- Do NOT provide personal information (e.g., credit or debit card number, Social Security number, or PIN) in response to an email request from anyone or any entity
- Check monthly statements to verify all transactions
- Forward any emails claiming to be from JPMC or MasterCard and include requests to provide personal account information to the Charge Card Program staff for review

4.7.3 Lost or Stolen Cards

When a purchase card is lost or stolen, immediately contact the JPMC Fraud Department by telephone at (888) 297-0778, or (847) 488-4442 (collect) if outside the United States, to report the lost/stolen card. Cardholders should also notify their approving official and the Charge Card Program staff as soon as possible and provide the following information:

- Cardholder's name and card number
- Date the loss was discovered
- Location where the loss occurred, if known
- If stolen, the date it was reported to local law enforcement officials
- Date JPMC was notified and any purchases made on the day the purchase card was lost or stolen
- Any other information that may be considered pertinent

JPMC immediately places real-time block on the activity of the lost/stolen account number, creates a new account, and issues a new purchase card with a new number. Trailing balances generated prior to the date of lost/stolen notification will be transferred to the new account number, with the exception of potentially fraudulent transactions, which are systematically held by JPMC for manual review and investigation.

If the cardholder identifies a fraudulent transaction(s) on the monthly statement for the new account number, the cardholder should dispute the transaction using normal dispute procedures. For these disputed transactions, JPMC executes standard procedures for investigation and resolution of the disputed item(s).

If the cardholder finds the card after having reported it lost or stolen, the cardholder should cut it in half and give it to the approving official. The Charge Card Program Manager should also be notified.

4.7.4 Card Receipt Verification/Activation

As a security measure, new cards and replacement cards for lost, stolen, or reissued accounts are not usable until the cardholder calls JPMC Customer Service at (888) 297-0781, or (847) 488-4442 (collect) if outside the United States, to activate his/her account.

4.8 Administrative Actions

Cardholders and Approving Officials must periodically initiate and process purchase card changes due to routine card reissuance or updates as well as cardholder separation or transfer.

4.8.1 Purchase Card Changes

There may be occasions when the information about the cardholder in JPMC's master file must be changed (for example, name change, location change, default accounting change, authorization limits). If so, please send changes via email to OConHelp@si.edu.

4.8.2 Card Re-Issuance

Generally, JPMC will reissue a card every three years. Approximately 60 days prior to the expiration date of the card, the Charge Card Program staff will provide a notification to the approving official of the pending expiration. Thirty days prior to the expiration, the approving official must notify the Charge Card Program staff whether or not the card should be reissued. Until this notification is received, JPMC will not reissue the card.

4.8.3 Training

Smithsonian purchase Cardholders and Approving Officials are required to attend an initial and refresher (every three years) Purchase Card Training class in order to remain up to date on purchase card program policies and cardholder responsibilities. OCon&PPM maintains the official record of training class attendance and notifies Cardholders of the approaching required training dates. Failure to attend required Purchase Card Refresher training may result in suspension or cancellation of purchase cards, or revocation of approval authority.

4.8.4 Separation or Transfer of the Cardholder

Cardholders or Approving Officials should notify the Charge Card Program Manager in advance of a cardholder's separation from employment to prevent fraud, possible card misuse, and ensure the card account is closed in a timely manner. The Approving Officer must obtain the purchase card from the cardholder and destroy it and make arrangements to appoint a new Cardholder. Unit personnel should also access and update the Smithsonian [Automated Exit Clearance Process \(AEC\)](#) in the ERP Human Resources Management System (HRMS) to confirm the card was collected and destroyed. The departing cardholder must review with the approving official the status of any unreconciled, questionable, partially approved, unresolved, and disputed transactions, and identify any supplies and/or services which have been ordered but not yet received, so appropriate action can be taken to complete these activities. In addition, the cardholder should coordinate with the approving official and merchants to terminate any recurring transactions (i.e., copier maintenance, cellular phone services, etc.). If the unit recurring charges need to continue, another unit cardholder will need to provide their purchase card number to the merchant for his/her card to be used.

If the cardholder transfers to another office or position with a different approving official, the new approving official will determine if that person will be a cardholder within his or her new position. When a transfer is within the same SI Unit, Charge Card Program staff will transfer the card. If the cardholder is transferring to a different SI Unit, and the 'receiving' Unit desires the individual to be a purchase cardholder, a new card application and a new [OCon 400, Application for Delegation of Purchase Cardholder and Approving Official Authority](#), form must be completed and submitted to the Charge Card Program Manager.

When a Cardholder transfers to a new position within the same Unit and will continue to be a cardholder under the same approving official, contact the Charge Card Program Manager to ensure the cardholder's records are updated.

4.8.5 Monitoring of Purchases and Purchase Card Reviews

Reports identifying each Cardholder's transactions are available in ERP for Cardholders and Approving Officials to monitor current and prior month(s)

transactions. Charge Card Program staff utilizes ERP reports, as well as JPMC electronic systems, to monitor and manage overall purchase card activities. On a monthly basis, the Charge Card Program staff conducts various data-mining techniques to monitor purchase card transactions and assist with their responsibilities for oversight and ensuring purchases are appropriate. The OCon&PPM staff may request additional information from Cardholders and Approving Officials regarding any purchase when necessary.

Reviews of individual Cardholder and Approving Official records are periodically directed by the Charge Card Program Manager as part of the policy and procedures compliance review process. These compliance reviews are randomly conducted or may be conducted to address particular concerns of the Charge Card Program Manager, unit managers, or Smithsonian leadership. The compliance reviews assist the Charge Card Program Manager, Cardholders, and Approving Officials in determining if charge card program duties and responsibilities are performed effectively, procedures are being followed, and program internal controls continue to be adequate. In addition to reviews conducted by the Charge Card Program staff, the Office of the Comptroller and Office of the Inspector General (OIG) may review purchase card activity to ensure purchases are appropriate and funded properly. The results of reviews assists the Charge Card Program Manager with determining the degree to which the Director, OCon&PPM, and senior management can be assured that charge card program internal controls and oversight are effective.

The Charge Card Program Manager compiles reports on serious and egregious misuse or abuse of purchase cards each quarter. These reports are submitted to senior management for review. When deemed appropriate by the Charge Card Program Manager and senior management, instances of perceived misuse or abuse of purchase cards are brought to the attention of the Inspector General for investigation.

When findings during a review or by any other means indicate that a Cardholder or Approving Official is not complying with the procedures contained in this *Desk Reference*, the Cardholder and Approving Official will be notified by the Charge Card Program staff. The Approving Official will be requested to take appropriate corrective action and notify the Charge Card Program Manager of the action taken. If the response is unsatisfactory, the use of the purchase card may be suspended or the purchase card may be canceled. Depending on the severity of noncompliance, the card or cards in question may be canceled by the Charge Card Program Manager before written notification is provided. The Approving Official and the Charge Card Program Manager are authorized to cancel a purchase card at any time without advance notice if circumstances warrant such action.

CHAPTER 5.0: The Purchasing Process**5.1 Overview of the Purchasing Process**

The following steps common in Smithsonian procurement processing, which may not all be applicable during purchase card transaction.

- a. Define purchasing needs by answering: what, where, how well, and when. A market surveys may be conducted to know approximately how much it will cost including any follow-on work. More specifically, describe the goods or services needed, determine when it is needed (delivery date for goods) or for how long (duration for services), define the deliverables (tangible items), write a work statement for any services, and determine technical or other evaluation factors.
- b. Identify the funding source, verify funds availability, and obtain and document internal approval for the purchase. Employees should always verify correct chartfields (funding information) for purchases with their fund managers.
- c. Review purchasing, including *OCon 6, Restrictions on Purchasing List*, and the restrictions on using purchase cards in this manual. Obtain external office approvals as indicated on the OCon 6.
- d. Identify sources for supplies and services. Consider checking what are called priority sources, including SI stock, Government entities such as AbilityOne (formerly JWOD) and GSA contractors. After considering those sources, the purchaser may now go to open-market vendors.
- e. Solicit quotations when required. This is the process of getting pricing and other information from vendors.
- f. Select sources that offer best value based on price and/or other factors. Purchases under \$10,000, may require only one source selection as long as the price is fair and reasonable
- g. Determine the purchase method and place the order. When possible, use a purchase card for purchases of \$3,000 or less (there are some restrictions). If the purchase card cannot be used, identify someone with the appropriate delegated authority who can make this purchase using a purchase order. If circumstances necessitate PO payment by purchase card, the approving official should contact Charge Card Program staff for guidance. Due to financial data reporting requirements Purchase Card purchases are generally restricted to \$3,000 or below.
- h. File documentation and maintain records. Purchase documentation requirements are addressed in *SD 314, Contracting*, and the *Procurement and Contracting Procedures Manual (PCPM)* available on the [SI Directives page](#).
- i. Administer the order, including physically receiving the goods or service, and documenting receipt of the order on the Purchase Card Transaction Log, and processing tagging if required.

5.2 Micro-Purchase and Other Acquisitions Procedures

“Micro-purchase” means an acquisition of goods (e.g., equipment, subscriptions, and office supplies) or services (except construction) when the aggregate amount of the purchase does not exceed \$3,000. Because purchase card purchases are generally limited to \$3,000, they fall within the guidelines for micro-purchases and do not require competition.

5.2.1 Competition

Micro-purchases may be awarded without soliciting competitive price quotations if the price is considered reasonable. Such purchases must be distributed equitably among qualified suppliers. Procurements of \$10,000 or less do not require competition; however, units are not precluded from seeking competition when unit program/project managers determine that competition could be beneficial to SI. Procurements exceeding \$10,000 require competition. The requirement for competition is met when the Procurement Delegate/unit solicits three or more vendors that are qualified and has a reasonable expectation at the time of the solicitation that quotes will be received. This is considered adequate competition even if only one quotation is received.

**3 solicitations = 3 quotes
3 tries, not 3 replies!**

5.2.2 Price Reasonableness

The administrative cost of verifying the reasonableness of the price of purchases not in excess of \$3,000 may more than offset potential savings in detecting instances of over pricing. Therefore, actions to verify the reasonableness of the price need be taken when:

- Information indicates that the price may not be reasonable (for example, comparison to previous price paid, personal knowledge of the item involved, or comparison to similar items).
- Purchasing a supply or service for which no comparable pricing information is readily available (for example, an item that is not the same or similar to other items recently purchased).

In such instances, price reasonableness may be obtained through securing and comparing additional quotes or by comparing one quotation to the following:

- The quote’s published price list or catalog price
- Prices paid previously for the same or similar items
- Prices reflected for comparable items through market research (e.g., Internet research, data provided by other cardholders or purchasing agents)
- Cost breakdown supplied by the quote (particularly appropriate for proposed services)
- Independent in-house estimate

5.3 Priority Sources for Supplies and Services

To ensure funds are spent in the most prudent and cost-effective manner, make sure items are obtained from Smithsonian stock supplies whenever available, and procurements are from Government or established supply sources whenever practicable. Check with OCon&PPM, use the Internet or catalogs to see if supplies or services are available from any of these sources (listed in priority order). **If the price is not a best value, the priority sources may be disregarded.** Once the review of priority sources has been exhausted, the purchaser may proceed to the open market. See *Table 322-2-2: Priority Sources for Supplies and Services* on page 26.

5.4 GSA Contracts and Supply Sources

5.4.1 General Services Administration (GSA) Contracts and Supply Sources

The General Services Administration (GSA) purchases and contracts with many commercial suppliers to provide more than 4 million commercial goods and services at low cost to the federal agencies. GSA awards contracts to multiple companies that offer commercial items falling within defined, generic categories called ‘schedules.’ GSA Contracting Officers determine that prices are fair and reasonable by comparing the prices or discounts that a company offers the Government with the prices or discounts that the company offers to its own commercial customers.

Purchases from vendors on GSA Schedule listings should be made after completing market research. Units are responsible for determining the best value. When purchases are made from GSA schedule contractors make sure to request a copy of the GSA contract terms and conditions, a pricing list and the company warranty for internal records.

Table 322-2-2: Priority Sources for Supplies and Services

Priority Sources (in priority order)	What's Available	Who to Contact
Smithsonian Excess Property	Desks, chairs, filing cabinets, typewriters, computer equipment and accessories	Contact the Personal Property Operations Branch, OCon&PPM at (202) 633-7430, OCon&PPMPPOBPropertyHelpDesk@si.edu
Smithsonian Stock Inventories	Items include envelopes, SI letterhead, mailing labels, copier paper	Review <i>SD 316, Supplies and Forms</i> , or contact the Personal Property Operations Branch, OCon&PPM at (202) 633-7430, OCon&PPMPPOBPropertyHelpDesk@si.edu
Excess from Other Federal Agencies	Furniture, computer equipment, motor vehicles, machinery, tools, medical & veterinarian equipment and supplies, photographic equipment and supplies, etc. Items are usually inexpensive or no cost and are transferred via a simple interagency form	Contact the Personal Property Operations Branch, OCon&PPM at (202) 633-7430, OCon&PPMPPOBPropertyHelpDesk@si.edu , or General Services Administration at http://gsaxcess.gov/ or, Department of Defense Excess Property site at www.drms.dla.mil
Federal Prison Industries, Inc. (Unicor)	New and rehab furniture; office signage, and office equipment.	www.unicor.gov or GSA Advantage at www.gsaadvantage.gov
AbilityOne (Formerly Javits- Wagner O'Day Act (JWOD) Program)	Office supplies, furniture, computer supplies, cleaning/janitorial products, and medical supplies	www.abilityone.com or GSA Advantage at www.gsaadvantage.gov
SI Contracts and Blanket Purchase Agreements	Office supplies; computer equipment; software licenses; business cards and stationary printing services; other commercial goods and services	http://prism.si.edu/ocfo/ocon/ocon_forms.htm
GSA Global Supply	Wide variety of commercial items stocked by GSA. Includes office products; appliances, cleaning & fabric products; safety gear/signs; medical/first aid items; tools, lawn and garden equipment; automotive & plumbing supplies, flashlights; paints, sealants and preservatives	www.gsaglobalsupply.gsa.gov or GSA Advantage at www.gsaadvantage.gov
Government Supply Sources (GSA Contracts)	Wide range of products and services	GSA Advantage at www.gsaadvantage.gov

5.4.2 Supply Sources for GSA

GSA offers several electronic tools that provide information on available commercial goods and services. These can be accessed through GSA's website at www.gsa.gov. Some of the tools are listed below.



5.4.3 GSA Global Supply Center

GSA Global Supply Center (<http://www.gsa.gov/portal/content/104618>) gives immediate access to thousands of products. The website allows the user to search GSA Global Supply's expansive product line and add desired items to a cart. The cart can be parked for future purchases and even emailed to others.

5.4.3.1 GSA Advantage! On-Line

GSA Advantage! (www.gsa.gov/advantage) is another online shopping and ordering system. It includes more than 3 million services and products awarded under Multiple Award Schedules (MAS). The website provides a search mechanism to identify vendors and pre-negotiated prices for their products and services. Users may browse GSA Advantage! to obtain price information, view GSA schedules, and commercial goods and services contractors. Orders placed with a purchase card for commercial goods placed on GSA Advantage! go directly to the contractor, creating a direct customer-contractor relationship. Acquisitions that require a statement of work cannot be made through GSA Advantage! These commercial services must be made through a purchase order.

Units are encouraged to use *GSA Advantage!* or contact three GSA vendors and compare prices. To browse, enter the shipping destination zip code on the *GSA Advantage!* sign-in screen.

5.4.3.2 GSA Supply Catalog

When units are unable to purchase directly on-line, units can order through the GSA supply catalog. To order a catalog on-line, go to the [Centralized Mailing List Service \(CMLS\)](http://www.gsa.gov/portal/content/101394) <http://www.gsa.gov/portal/content/101394> and submit the request to the address indicated. To order a catalog by telephone, call GSA at (800) 488-3111.

5.4.3.3 GSA Customer Supply Center (CSC) and Industrial Products Center (IPC) Orders

The CSC has more than 7,000 items in stock. Although CSC accepts a purchase card for supplies, they are less accessible as they require an Activity Address Code (AAC) number. Orders may be placed by phone (800-525-8027), fax (800-856-7057), email (csc.order@gsa.gov) or U.S. mail to: GSA, FSS, Customer Supply Center, 501 W Felix Street, Bldg 11A, PO Box 6659, Ft. Worth, TX 76115.

Smithsonian users, who are unable to access GSA options, may contact OCon Help to establish an account. GSA walk-in stores are available only in Europe, Hawaii, California, the Far East and Alaska.

5.5 Smithsonian Institution-Wide Agreements

Various Institution-wide Blanket Purchase Agreements (BPAs) and contracts have been established for use by all units. BPAs provide discounts off of GSA contract pricing schedule. A current listing of BPAs awarded by the Simplified Acquisitions Division, OCon&PPM, is available on the [OCon&PPM Prism website](#) under Procurement Information. Some BPAs listed are for:

- Office supplies
- Printing/Employee Business Cards
- Vehicle rentals
- Printer and PC consumable supplies
- Computer equipment (Dell, Gov Connections, Insight Public Sector, SDV Solutions);
- Direct bill hotels

NOTE: Each of the companies on the BPA Listing ([OCON 9](#)) will accept a purchase card and most are accessible on the Web. Purchases made against a BPA, require the creation of a delivery order (PO Type is DO on the PO Header Details page) in PeopleSoft and list the BPA number in the SI/Gov't contract field (also on the PO Header Details page). A

Blanket Purchase Agreement Listing ([OCON 9](#)) is available on the [OCon&PPM Forms and Reference webpage](#) on Prism under Procurement Information.

The Contracting divisions in OCon&PPM have awarded SI-wide contracts in support of:

- Architectural engineering
- Construction
- Exhibition design and data processing
- ADP services
- Exhibit fabrication services
- Testing and inspection (hazmat)
- Exhibit design
- Construction management
- Trash removal & recycling services
- Disposal of chemical waste
- Accounting services
- Transportation (packing & crating)

NOTE: To place an order against one of these SI-wide contracts, create, approve and budget checks a requisition in PeopleSoft. OCon&PPM will make the award. Refer to the list of IDIQ Open Term Contracts ([OCON 11](#)) on the [OCon&PPM Forms and Reference webpage](#) on Prism or send a request for more information to OConHelp@si.edu.

5.6 Open Market Purchases

If it is determined that required goods and services are not available from priority sources or do not represent the best value, purchasing from the open market (commercial market place) is allowable. Price quotes are required from at least three vendors for all purchases of more than \$10,000. The required quotes may be obtained by telephone or electronic means and should be documented and kept as part of the purchase order file.

To the maximum extent practicable, and within the context of SI contracting needs, small and disadvantaged businesses (including small, minority, socially and economically disadvantaged 8(a), woman-owned, historically underutilized business zone (HUB-Zone), and service-disabled veteran-owned businesses) should be provided opportunities to compete for, and be awarded, SI procurements and contracts for which they qualify and can meet performance requirements. (See [SD 216, Supplier Diversity Program](#)).

The SI Supplier Diversity Program (SDP) helps to ensure diverse sources for SI procurements and increases the diversity of sources in SI procurements. Each year, the [Office of Equal Employment and Minority Affairs](#) (OEEMA), in coordination with OCon&PPM, establishes goals for utilizing small and disadvantaged businesses with the Small Business Administration (SBA). The SDP Manager, as the lead SI official responsible for outreach to small and disadvantaged businesses, monitors and reports the results.

NOTE: When an award will be made under the 8(a) Program, please contact OConHelp@si.edu.

The following table is a summary of the competition dollar thresholds and related requirements.

Table 322-2-3: Competition Dollar Thresholds and Requirements

Total PO Price	Competition Requirements	Use Small and Small Disadvantaged Businesses
\$10,000 or Less	Unless price quoted seems unreasonable or you are familiar with the market for this type of purchase, competition is not required. Rotate vendors to avoid preferential treatment and to stay abreast of the market.	To the maximum extent practicable, and within the context of SI contracting needs, procurement opportunities should be provided to small and small disadvantaged businesses
Over \$10,000 and Does not Exceed \$100,000*	Three (3) price quotes required. Document the file.	Required; large business can be used when you are unable to identify a qualified small business and SDP and concurs. Document the file.
Over \$100,000	Purchases over \$100,000 are over the Simplified Acquisitions threshold and are considered large contracts; unless it is to acquire commercial goods or services not exceeding \$5.0 + million. Otherwise, purchases over these amounts must be submitted to OCon&PPM on a requisition for processing and award.	Encouraged

* \$150,000 for Smithsonian Astrophysical Observatory (SAO) and Office of Sponsored Projects (OSP)

+ \$6.5 million for SAO and OSP

5.7 Finding Vendors

There are several places potential open-market vendors can be found:

- The SI Office of Equal Employment and Minority Affairs (OEEMA) provides information on qualified small businesses. OEEMA has a website available to SI staff for assistance in obtaining Small and Disadvantaged Businesses and is designed to assist staff in identifying small businesses capable of meeting their specific contractual requirements. All of the businesses listed have expressed an interest in doing business with the Smithsonian. To access the website, go to prism.si.edu/oemain (Vendor Registration Form).
- Talk to other SI units who have made similar purchases or utilized particular vendors.
- Use traditional information sources like the Yellow Pages and trade journals
- Utilize the following e-commerce websites to identify Small Businesses

Table 322-2-4: E-Commerce Websites for Identifying Small Businesses

E-Commerce Website	Description of Services
http://www.si.edu/oema/	The Office of Equal Employment and Minority Affairs (OEEMA) website available to SI staff identifies Small and Small Disadvantaged Businesses by type, location, SIC code, and description. Each business listed has expressed an interest in doing business with the Smithsonian. OEEMA appropriately provides information on planned Smithsonian procurements to these qualified small businesses.
www.SAM.gov	The System for Award Management (SAM) is used to: access up-to-date business, socioeconomic program status, and banking information about vendors; identify potential vendors; enter vendors into the SI ERP Vendor Maintenance system; and help to avoid rejected and returned payments due to vendors' changes in addresses and banking information. Registration with SAM is required by individuals or companies that wish to do business with the SI, before an award is made. Information on SAM, and any potential exemptions or exceptions, is found in SD 314, PCPM 5 .
www.fedcenter.gov/	Exclusively for use by Government purchasing agents. This website provides open market, GSA items and services in one site.
www.gsa.gov	Facilitates searches of GSA schedules by product category, schedule number, SIN code or vendors.
www.thomasregister.com	This website contains lists all U.S. manufacturers. You can obtain quotes from local area distributors by contacting the manufacturers directly.

5.8 Purchasing Methods

There are several methods used by the Smithsonian Institution to purchase required goods and services. These include the purchase card, purchase orders, orders placed against a Unit Blanket purchase agreement, and, on rare occasion, use of personal funds (subject to reimbursement).

5.8.1 Purchase Card

The Government-sponsored purchase card is the first option for purchases of \$3,000 or less (micro-purchases) if the goods or services are authorized for purchase card usage. Purchase cards shall be used whenever possible, since its use diminishes the need for reimbursements for purchases made with personal funds, reduces the number of written purchase orders, and alleviates related administrative processing cost and lead time. It is a quick way to purchase from priority sources or the open market, especially online. In addition, the amount of administrative time spent approving invoices and tracking payments is minimized, as only one invoice is paid at the end of the month to the card provider. Units can reallocate transactions to the appropriate chartfields (funding information).

Separate training classes are offered on using purchase cards. For more information, contact OConTraining@si.edu.

5.8.2 Purchase Orders

Purchase orders (POs) are a commonly used method of purchasing at SI. The dollar amount and classification of a purchase determines if a purchase can be made using the purchase order process. The details of soliciting and awarding purchase orders are covered in the OCon&PPM *Procurement and Contracting Procedures Manual (PCPM), Part 2*.

5.8.3 Unit Blanket Purchase Agreement/Unit Blanket Purchase Order (UBPA/UBPO or UB)

A UBPA is a purchasing agreement established between an SI unit and a contractor for the use of that specific unit. A UBPA can be established when: it expects to make multiple purchases from a single vendor during a fiscal year; the single and aggregated dollar amounts of purchases do not exceed the spending limitations cited in the delegations of authority to unit employees. The term UBPA and UPBO are often used interchangeably. Unit Blanket Purchase Orders can be set-up to allow units to order items from a vendor on an “as needed basis.” It is similar to setting up a charge account with an individual vendor. UBs are covered in more detail in the OCon&PPM *PCPM 2, Simplified Acquisitions*.

5.8.4 Purchases Made with Personal Funds

Occasionally purchases are made by employees using their personal funds. For procedures regarding reimbursement to employees for approved purchases refer to [*SD 302, Financial Management Payment Policies, Systems and Procedures \(Handbook\)*](#), under Smithsonian Miscellaneous Reimbursement (SMR) (formerly known as petty cash), accessible from the [Office of Comptroller \(OC\) website](#) on Prism.

5.9 Writing a Statement of Work

5.9.1 Writing a Statement of Work

Statements of work are necessary for orders requiring a contractor to perform a service. A well-written statement of work protects the Smithsonian by assuring the integrity of the purchase. A statement of work is a description of the work, goods, or services to be performed and explains what the contractor is expected to do and deliver. It contains requirements that can be legally enforced to ensure services are fully performed with the required results, that deliverables are submitted on time, and that the work is of the quality required.

The statement of work is the core of the service order (or goods order which has a service component). Deliverables and due dates need to be stated with acceptance criteria for each deliverable. Whenever practical, the statement of work should be written based on the results expected rather than written with specific descriptions of how to do the work.

Example: The contractor shall mow grass at a level of two inches often enough that it will not exceed four inches. The contractor shall mow only between the hours of 2:00 p.m. and 6:00 p.m. on week days. The contractor shall mow the entire area within those hours, in one day.

When writing a statement of work, think in terms of answering all the questions that identify the important details. See *Table 322-2-5: Important Details to Include in a Statement of Work* on page 34.

NOTE: OCon&PPM offers a one-day class on “Developing Statements of Work” that is highly recommended for persons responsible for developing or reviewing purchase descriptions, writing purchase orders, or active in the approval or administration of purchase orders for Simplified Acquisition.

Table 322-2-5: Important Details to Include in a Statement of Work

Questions	Important Details to Include in a Statement of Work
Who?	Indication of who the purchase is for (e.g., what museum or office, or who the audience would be)
What?	A full description of the service to be purchased
When?	The delivery date for a product or the performance period (beginning and ending dates) for a continuous service; could also include the frequency of service
How Well?	The quality expected; the criteria or standards against which a deliverable is measured before it is accepted by SI
Where?	Address for delivering the item or the location of service performance
Why?	The purpose behind the purchase especially if this information provides depth in describing the services required by the requestor

5.10 Soliciting Quotes

Generally, purchases over \$3,000 should not be made using the purchase card. Procurements of \$10,000 or less do not require competition; however, units are not precluded from seeking competition when unit program/project managers determine that competition could be beneficial to SI. Procurements over \$10,000 require competition. The requirement for competition is met when the Procurement Delegate/unit solicits three or more vendors that are qualified and has a reasonable expectation at the time of the solicitation that quotes will be received. This is considered adequate competition even if only one quotation is received.

Whether soliciting quotes orally or in writing, the Procurement Delegate/unit shall ensure the requirements are described in a clear, concise manner to each prospective vendor. The request for quote (RFQ) shall include, at a minimum: a description of the supplies and services, the quantities required, the delivery date and location and a deadline for responding to the solicitation. For commercial goods, this may be done verbally whenever practical. For services, purchases with complex specifications, or purchasing numerous items, quotes should be solicited in writing (including fax or email).

In addition, the Procurement Delegate/unit shall:

- Always provide potential vendors with the same information regarding the good and services required.
 - Description of the item required or a performance-based description of work (service)

- Delivery date or schedule
 - Acceptance criteria
 - The basis of award if other than price (evaluation criteria)
 - Insurance requirements and intellectual property rights if applicable
- Inform all vendors that the quote requested is for a fixed price contract; SI small purchase orders are generally fixed price.
 - Not reveal the budget for this purchase or project.
 - Inform vendors that the Smithsonian is exempt from most sales taxes as a federal entity and as a non-profit organization, and is entitled to any federal or non-profit pricing.
 - Make it clear that the request for quote (RFQ) is not a commitment by SI to purchase.
 - State that quotes are valid for 30 days, unless otherwise specified.
 - Not discuss any vendors' pricing or any other proprietary information with another company.
 - To avoid the appearance of personal preference or favored treatment of a single supplier, rotate vendors who provide similar supplies or services.

<p style="text-align: center;">3 solicitations = 3 quotes 3 tries, not 3 replies!</p>

5.11 Questions to Ask When Soliciting Quotes

The Procurement Delegate/unit shall ask each vendor the following questions, as applicable:

- Can the required delivery date be met?
- Is this service or item under GSA Schedule? If so, please provide the GSA contract number, the schedule number and price list with GSA terms and conditions.
- Is the vendor registered in CCR?
- Is the vendor classified as a small, minority, women owned or disadvantaged business? If so, the vendor certified under the 8(a) Small Business Program?
NOTE: If the vendor is under the 8(a) Program and an award will be made, please contact OCon Help before issuing a request for quotation.)
- What is the firm fixed price (including all shipping costs)?
- Does this price include delivery? If shipping is not included in the price, what are the estimated costs?

The Procurement Delegate/unit shall consider the following provisions for potential applicability to individual procurements. These special considerations include: Economic Quantity Discounts, *Service Contract Act* (SCA), *Buy America Act* and Transportation Provisions and Procedures. For more information see the OCon&PPM [*Procurement and Contracting Procedures Manual \(PCPM\), Part 2*](#).

5.12 Evaluating the Quote and Selecting a Vendor — Lowest Price or Best Value

Each solicitation shall include the evaluation criteria so that vendors can respond accordingly. Development of criteria is dependent upon the type of item or service being purchased and the type of evaluation method selected. Depending on the item or service being purchased, the Procurement Delegate selects either the lowest price or best value evaluation type.

Generally, lowest price is the determining factor in vendor selection for equipment items and simple services. Best Value is use for more technical or complex procurements. The technical and cost aspects of the procurement have to be taken into consideration when determining what evaluation criterion is appropriate. Cost must be included in all best value procurements. The Procurement Delegate and the project staff have great flexibility in developing criteria to meet needed requirements. They must include a combination of the following criteria or other criteria they determine as evaluation criteria:

- Past performance
- Experience
- Special feature of the product/service
- Trade-in consideration
- Probable life of the item selected
- Warranty considerations
- Environmental and energy efficiency considerations
- Technical qualifications
- Maintenance availability
- Price (Price must always be an evaluation criterion)

Normally all evaluation factors are considered equal in weight, but if the Procurement Delegate/unit determines that one criterion is more important than another, this must be stated in the solicitation document. Once the evaluation and criteria have been established, the Procurement Delegate/unit includes the evaluation criteria within the solicitation documents and ensures all quotes are compared using the established criteria during the evaluation phase.

Example: “I chose Company X’s tool because they offer on-site calibration free for three years. The make and model was rated top for quality and reliability in the trade journal. The price is only 5 percent higher than Company Y’s, and Y offers no post-purchase service. The value of service justifies the small price premium.”

5.13 Receiving, Inspection and Acceptance Using the Purchase Card

Units are responsible for ensuring that all services are performed or goods purchased are received, promptly inspected, and for verifying that the delivered items meet the specifications cited in the order. When purchase orders are issued for services, the person identified as the Contracting Officer's Technical Representative (COTR) is responsible for assuring that the service is provided and acceptable as defined in the order/contract.

In addition, keep the following in mind:

- The unit/COTR should contact the vendor when delivery does not occur within the specified period of performance or agreed upon delivery date. The unit/COTR shall document the phone calls/emails (date, time, the person contacted, phone number or e-mail) and outcome of the communication. If the issue cannot be resolved and the Procurement Delegate/unit decides to pursue purchase order/contract termination, contact OCon Help. OCon&PPM is the responsible office for processing terminations.
- When shipments are sent to the warehouse, the warehouse will inspect the order to determine if an order is complete and undamaged. Upon receipt of the order from the warehouse, the unit is responsible for final inspection and to ensure the item functions and meets the required need.
- Once purchased items are received, enter the date received on the Purchase Card Transaction Log. For receipt of sensitive items someone other than the cardholder or individual who requested the purchase should 'witness' the receipt and sign the appropriate line of the Purchase Card Transaction Log. Be sure to obtain SI property tags for any accountable non-expendable personal property or sensitive items received. See next page for additional information.
- Follow up on problems immediately by contacting vendors, documenting actions taken, and calling OCon&PPM for help.

REMEMBER:

- PROMPTLY follow up and document any discrepancies or damage
- Don't be caught with an expired warranty and unopened boxes.
- Call JPMC at (888) 297-0781 or (847) 488-4442 (collect) if outside the United States to dispute a transaction.
- Call the OCon&PPM Help Desk for guidance at (202) 633-7410.

5.14 Non-Expendable Personal Property

The following items are accountable non-expendable personal property items and subject to tagging and entry to the Smithsonian property inventory by OCon&PPM staff at the warehouse (3400 Pennsy Drive, Landover, MD 20785).

At the Smithsonian Institution (SI), sensitive personal property is non-capitalized personal property items considered highly vulnerable to pilferage, inappropriate use, and/or inappropriate disposal, and may present serious liability to the SI if lost and misused. Some sensitive personal property items shall be recorded and tracked in the Assets Management (AM) module of PeopleSoft regardless of its acquisition costs. Other sensitive personal property shall be recorded and tracked in AM when its acquisition costs is \$1,000 or higher.

Table 322-2-6: Sensitive Personal Property Assets List

Sensitive Personal Property Assets List (Effective October 1, 2011)	
Sensitive Personal Property — Regardless of Acquisition Costs^{1/}	<ul style="list-style-type: none"> • Firearms • Motor vehicles (transportation equipment, automobiles, motorcycles, trucks, vans, motorized carts, boats, ships) • Portable computers (laptops, tablet PCs, net-books, “mini” desktops, handheld bar-code readers and equivalent items) • Computer servers
Sensitive Personal Property — Acquisition Costs of \$1,000 or Higher^{2/}	<ul style="list-style-type: none"> • Camcorders • Cameras • Copiers, fax machines, desktop scanners and printers • Projectors, when not permanently mounted

1/ It has been determined that there is minimal risk of access by unauthorized persons to the information and data Blackberries© contain because they are connected to a Smithsonian-managed server. OCIO can immediately delete any information and data they contain when Blackberries© are reported lost or stolen. Therefore, it is not necessary to enter and track Blackberries© in AM.

2/ Permanently mounted personal property assets, such as projectors installed inside a wall or floor, mounted to ceilings or columns, and not removable without requiring major disassembly of items, structural alterations, or causing structural damage. These items, when permanently mounted, are considered real property, not personal property.

All items above can only be purchased using a purchase order unless an emergency exists and prior approval to use the Purchase Card has been granted by the Charge Card Program Manager.

If an emergency exists, the Unit must submit an *OCon 410, Request to Waive Restriction on the Use of Purchase Cards to Acquire Sensitive Personal Property Items*, form to the Charge Card Program Manager. A copy of the OCon 410 form and related procedures are on the [OCon&PPM Forms and Reference webpage](#).

When any of the items listed in Table 322-2-6 above are purchased with a purchase card and received at the unit, cardholders must provide a copy of the purchase card receipt and related documentation within three business days to the appropriate unit Accountable Property Officer (APO). The APO will then contact the Personal Property Operations Branch (PPOB) staff in OCon&PPM to ensure proper tagging occurs and the sensitive property item(s) is entered into the Smithsonian property inventory records.

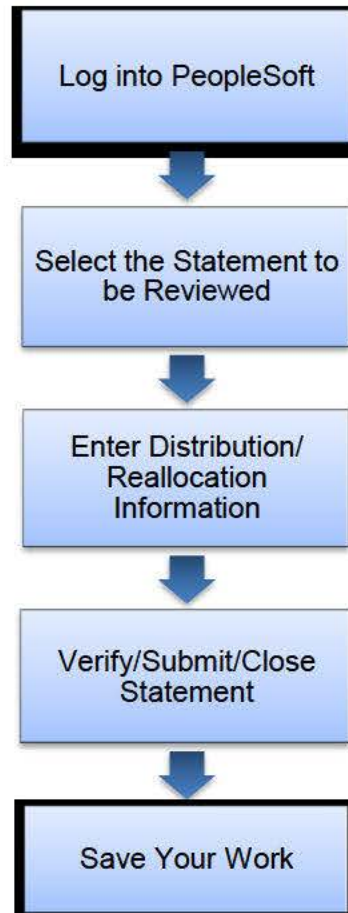
Cardholders or the Unit APO must fax the following information to the OCon&PPM Warehouse at (301) 238-2035:

- Cardholder's name,
- Cardholder's phone number
- Last four digits of the purchase card used in the transaction
- Unit title, and address
- Name of the Unit APO
- Description of item(s) ordered including: model number, name of manufacturer
- Chartfield information for the purchase
- Cost of item(s) and quantities

Upon receipt of the required item, the unit must immediately prepare and submit the *OCon 200, SI Property Tag Request*, form to PPOB to obtain a SI Property Tag.

CHAPTER 6.0: Purchase Card Reconciliation and Reallocation in PeopleSoft**6.1 Purchase Card Module in the Enterprise Resources Planning (ERP) system (the SI Financial System)**

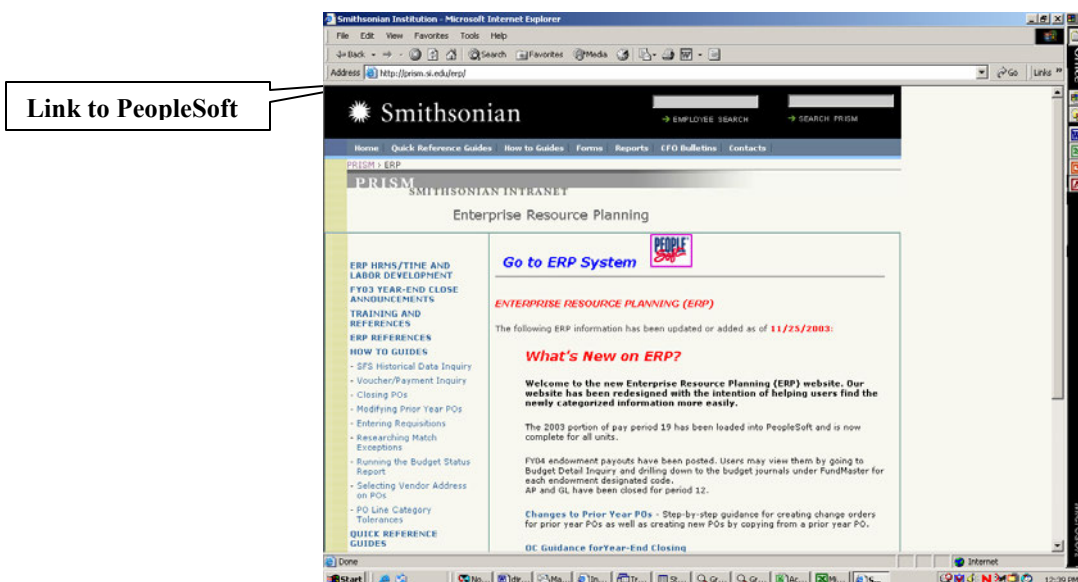
Purchase Cardholders and Approving Officials are required to reconcile their purchase card statements and verify or approve transactions each month in ERP, the Smithsonian financial system. The steps for doing this are outlined in the flow chart below.



6.2 Logging into ERP

To login to ERP:

- Open Internet Explorer
- Access Prism
- Select the [ERP Financials](#) link to display the ERP page.
- Select [Go to ERP System](#) (When the “Warning” message appears on the next screen, click **OK**.)

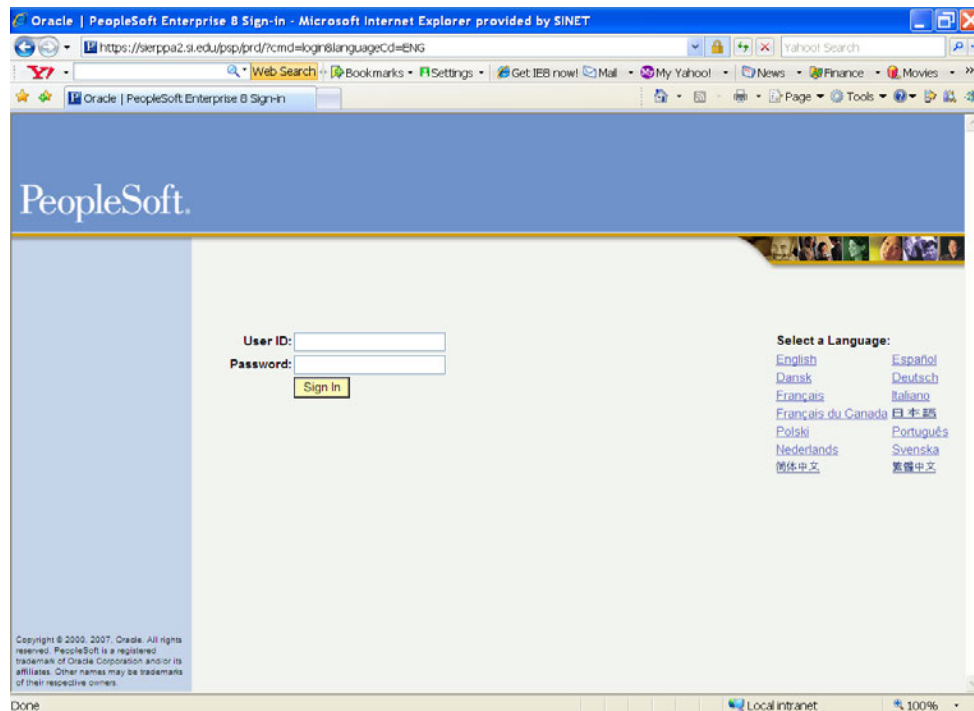


IMPORTANT: A User ID and password is needed to login to ERP. A User ID can be obtained by completing the Introduction to ERP class and submitting a completed [SIERP Security Form: Purchasing](#) required by the Office of the Comptroller. This form and the schedule for ERP Training class can be found on **PRISM>ERP>Financials Home Page**.

For individuals who are both a purchase cardholder and an approving official for other cardholders, please use a **Single sign-on** User ID and select the appropriate **Role Name** on the **Reconcile Statement Search** screen (see Accessing Purchase Card Statements).

Logging into PeopleSoft

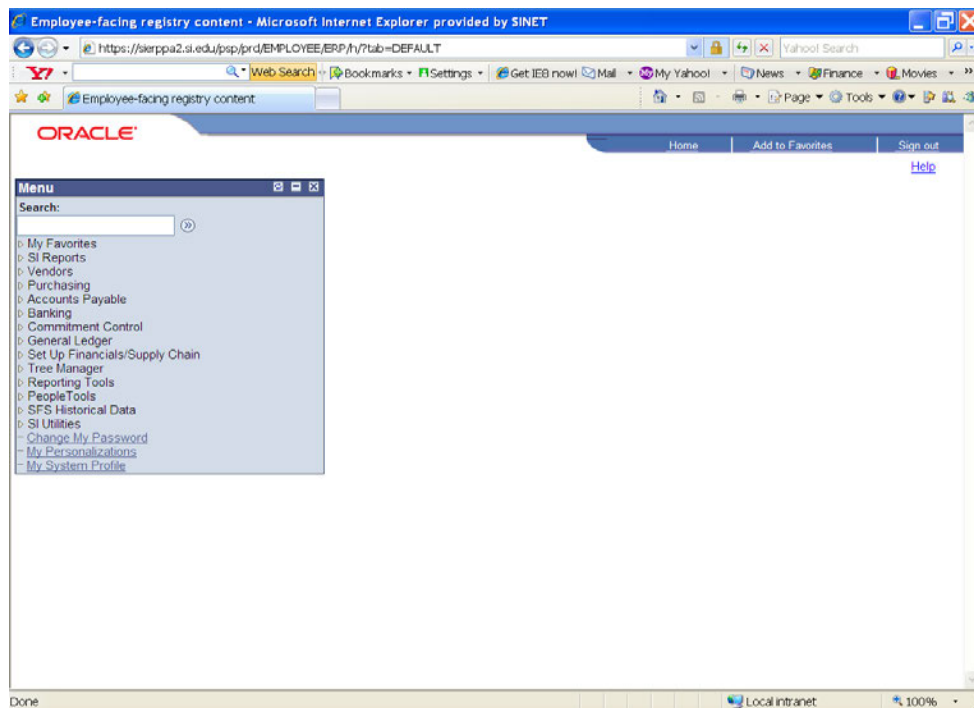
- The **ERP Sign-In** page is displayed.



Sign In page

1. Enter **User ID**.
 2. Enter **Password**.
 3. Click **Sign In**.
- TIP: To access forgotten User ID or password; contact the ERP Support Line at (202) 633-4000.
 - TIP: Use the **Favorites** button link to bookmark this page. This will allow you to access PeopleSoft by selecting the Favorites menu item.

Once entered, the *ERP Main Menu* page is displayed.



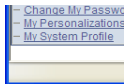
Main Menu page

6.3 Accessing Purchase Card Statements

To access the Purchase Card statement, from the main ERP menu, follow these menu steps:

- Click **Purchasing**
- Click **Procurement Cards**
- Click **Reconcile**
- Click **Reconcile Statement**

The *Reconcile Statement Search* screen will then appear





Reconcile Statement Search screen

Purchase Cardholders and Approving Officials may enter search criteria for transactions they desire to view and/or reconcile. Typically, a Cardholder or Approver would select their role using the drop down arrow in the **Role Name** field and then select **Search**.

A listing of your card(s) will appear. For multiple cards, a user may narrow **Searches** by entering either the **Employee Name** or last four digits of the **Card Number** in the appropriate **Search** field.

Reconcile Statement Search screen

NOTE: The **Reconcile Statement** search feature will support multi-element ‘specific’ searches. Users performing such searches should consider the following:

- The **Merchant** field on the **Search** screen will only return data if there is an exact match on the entire name. The field does not accommodate any type of wild card or partial name search. The only way to utilize the Merchant field in the search criteria is to know and enter exactly how the merchant name is reported in the transaction list.
- For example: A user would need to enter “**THE HOLLINGER CORPORAT**” (as displayed on the following page) in the Merchant field on the search screen.
- If searching for a **Billing Date**, select a card issuer, or otherwise, no list of values will be displayed for the billing date.
- **TIP:** Use the  **Add to Favorites** link to bookmark this page. This allows access to the Reconcile Statement page by selecting the  **My Favorites** menu item (located at the top of the PeopleSoft menu).

The system will return results on the ***Reconcile Statement*** screen. The card issuer and card number are displayed in the first two columns to provide vendor and account number information for each transaction listed.



Reconcile Statement screen

The statement displayed will contain all transactions that occurred during the previous month's cycle (26th of the month through 25th of the following month). JPMC transactions are usually loaded into PeopleSoft by the 27th of each month. Cardholders and Approving Officials are notified via email by the Charge Card program staff when the transactions are loaded and the deadline for reconciliation. The total statement amount is given at the top of the ***Reconcile Statement*** screen along with cardholder information. Each transaction is sequentially numbered by line with the line number displayed on the left hand side.

When the transactions first appear, they are assorted by transaction number. To sort by another category, click on the title of the category. For example, when sorting by transaction date, Cardholders and Approving Officials may click on the column titled **Trans Date**.



6.4 Reallocating Transactions

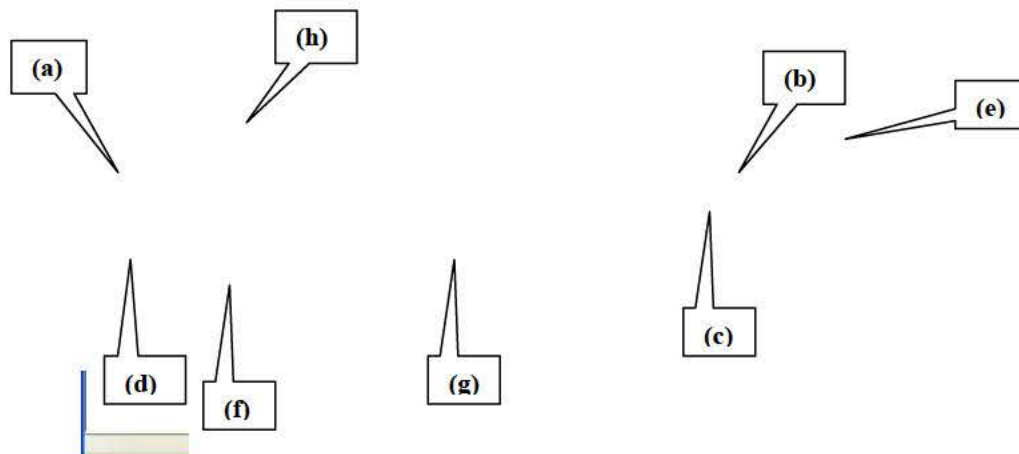
Each purchase card is set up with a default chartfield (or funding information), which is specified by the unit. If a purchase card transaction needs to be expensed to a different chartfield, the cardholder (or approving official) will need to reallocate the expense. If transactions are NOT reallocated, the expenses will be paid out of the cards' default chartfield.

NOTE: It is ultimately the Approving Official's responsibility to review and ensure transactions are allocated appropriately and within the time frame allotted specified by the Charge Card Program staff.

The chartfield is composed of different elements which include: Fund Code, Budget Reference, Designated Code, Department ID, Account, Class Field, Program Code, Project, and Activity ID. Any or all of these elements can be changed during reallocation.

6.4.1 To reallocate an individual transaction:

1. From the **Reconcile Statement** screen, select the box in front of the line item to be reallocated (a).
2. Select the **Distribution** icon (b) to begin reallocation.



ID	Field Name	Field Definition
(a)	Line Item	Specific transaction line
(b)	Distribution	The distribution icon allows you to review or edit the distribution of the selected line.
(c)	Comments	The comments icon allows you to put comments in about each transaction. Lines will appear in the bubble to show that information has been added.
(d)	Select All	The hyperlink allows you to update the status of transactions in bulk.
(e)	Redistribute	“NO” will change to “YES” when a transaction has been reallocated to a chartfield other than the default assigned to the PCard.
(f)	Purchase Details	The hyperlink allows you to link PCard transactions to Purchase Orders (PO).
(g)	Status	The button(s) allow you to change the status of selected transactions to “staged”, “verified”, or “approved.”
(h)	Billing Tab	This tab shows the transactions that are linked to Purchase Orders (PO).

— The *Account Distribution* screen will then be displayed.

Reconcile Statement - Microsoft Internet Explorer provided by SINET

https://sierppa2.siu.edu/psp/prd/EMPLOYEE/ERP/C/MANAGE_PROCUREMENT_CARDS_CC_RECON_WB.GBL?Folder=...

ORACLE

Reconcile Statement

Account Distribution

Line: 1 PO Qty: 1.0000 UOM: EA
Billing Date: 04/25/2009 Billing Amount: USD 765.00 Unit Price: 765.00000
SpeedChart: Transaction Unit Price 765.00000 *Distribute Amount by:

Distributions


Dist	Percent	Amount	Currency	GL Unit	Entry	Event	Fund	Bud Ref	Dsgc	Dept	Account Class	Program	PC Bus Unit	Project	Activity
1	100.000	765.00	USD	SI000	APVOUCHE	000	2009	010001	351000	6100	2525	8400			

OK Cancel Refresh

Account Distribution screen

3. To change the chartfield, a user may select that field requiring changes; or add and enter the specific data (e.g., fund code, class type, project, activity ID); or click on the magnifying glass next to the specific field for a list of possible values. Choosing the latter allows the selection of a specific value. Once the change is made, click OK and the value will be automatically entered.

4. Select .

- To allocate the expense across more than one distribution, select the  on the **Account Distribution** page (scroll to the right to see this button). Enter the number of rows needed, then use the Amount or Percent field to distribute the cost.

NOTE: Department chartfield values are restricted to a pre-defined list furnished by Approving Officials. For department values not available to you, please notify the Approving Official (AO). Only the AO may request OCon Charge Card program staff to provide access to additional department ID's within your unit.

- To review and reallocate a second line, return to **Step 1**.
 - TIP: To reallocate multiple transactions to the same chartfield, use the 'Select' column on the Statement screen and to choose the multiple transactions. Once the desired transactions are chosen, select the distribution icon on one of the transactions to enter the desired chartfield.
5. When returning to the **Reconcile Statement** screen click "**Save**" to incorporate new changes.

NOTE: If an error is made in the chartfield, for either an individual element or combination values (for example: an incorrect fund value is given with a particular designated code), an error message will be generated when attempting to save changes. **No transaction changes can be saved until the error is corrected.** The error message will indicate the line and distribution number in error. Errors in multiple lines are noted one at a time in line number order. This edit checking process is illustrated on the next page.

PURCHASE CARD RECONCILIATION AND REALLOCATION IN PEOPLESFT

In the figure below, an incorrect distribution chartfield combination is entered on line 5 (the designated code 010001 is not valid with fund 401).

Dist	Percent	Amount	Currency	GL	Unit	Entry	Event	Fund	Bud Ref	Dsgc	Dept	Account Class	Program	PC Bus Unit	Project	Activity
1	100.000	5.66	USD	SI000	APV	VOUCH	401	2009	010001	38100	6100	2333	8300	SI000	38GENMGMT	DEFAULT

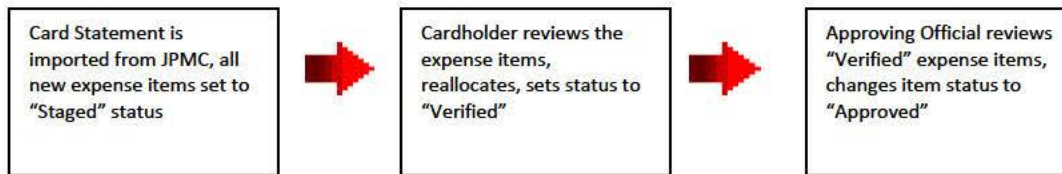
If the user tries to save changes, the combo edit error message pop-up appears.

Correct Chartfields Combination on Distribution Line Number: 1 - (10208,66)
For a list of valid Chartfield combination data, please refer to Combination Data under Set Up Financial/Supply Chain > Common Definitions > Design Chartfields > Combination Editing > Review Combination Data.

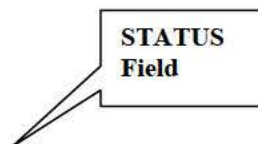
NOTE: The combo edit checking function will also find errors in the card default chartfield initially assigned to staged transactions when the statement is loaded. If an error message is received when attempting to save the statement, and if the problem is the distribution of the purchase card default chartfield distribution, please contact the Charge Card Program staff, OCon&PPM, (see *Where to Go for Help*) or the OCon&PPM Help Desk at (202) 633-7410. Please make available a valid replacement default distribution for the purchase card. You can fix your current statement by using the *Distribution Template* feature (see page 53) to redistribute all of your incorrect “staged” transactions that have the bad default distribution.

6.5 Verifying/Approving Purchase Card Statement

The overview of the process for reconciling purchase card statements in PeopleSoft each month is shown below.



The **Status** field on the **Bank Statement** screen contains several different values which play an important role in the reconciliation process.



The individual statuses are defined below:

Field Name	Field Definition
Staged	This status is assigned to each transaction when it is initially loaded into PeopleSoft from JPMC.
Verified	(Cardholders) Select this status after you have reviewed the transaction and have entered the chartfield information
Approved	(Approving Official) Only the Approving Official can select this status indicating the transaction has been reviewed and approved.
Closed	(OCon&PPM/OCIO) Transaction has been verified, approved, and vouchered (affecting the budget balance) and will no longer appear on the bank statement.

The purchase card reconciler will be able to change the status from **Staged** to **Verified** and from **Verified** to **Staged** (if needed). Once a transaction has been “approved,” it cannot be changed by a reconciler.

An Approving Official will be able to change the status from **Staged** to **Approved** (no need to set it to “verified”). The status of **Verified** or **Approved** transactions can be changed to **Staged** or **Verified** until the deadline for reconciliation has occurred.

Transaction	Card Issuer	Card Number	Trans Date	Merchant	Status	Transaction Amount	Currency	Chartfield Status	Redistrib	Voucher Error
1	PSI2	*****4013	03/25/2009	GSA/FAS	Approved	37.00 USD		Valid	No	No
2	PSI2	*****4013	04/06/2009	PERSONAL PROP CTR	Approved	2,150.00 USD		Valid	No	No
3	PSI2	*****4013	04/13/2009	PERSONAL PROP CTR	Approved	1,425.00 USD		Valid	No	No
4	PSI2	*****4013	04/09/2009	GSA/FAS	Verified	1,530.24 USD		Valid	No	No
5	PSI2	*****4013	03/27/2009	NATIONAL CONTRACT	Verified	1,188.00 USD		Valid	Yes	No
6	PSI2	*****4013	04/01/2009	CONSTRMGMTASSOCAMER	Verified	900.00 USD		Valid	Yes	No
7	PSI2	*****4013	04/01/2009	CONSTRMGMTASSOCAMER	Verified	435.00 USD		Valid	Yes	No
8	PSI2	*****4013	04/09/2009	CAN CANON USA GMD	Verified	24.00 USD		Valid	Yes	No
9	PSI2	*****4013	04/09/2009	CAN CANON USA GMD	Verified	24.00 USD		Valid	Yes	No

6.5.1 To change the status of a transaction:

1. **Click** on the drop-down arrow next to the current status of the individual transaction.
2. Choose **Verified** (cardholders only) or **Approved** (approving officials only).
3. Continue with the next transaction.
4. Click **Save**.


NOTE: Approving Officials must review all cardholder statements after they have been set to **Verified** by the cardholder, and change the status to **Approved**. As an Approving Official, this is a key responsibility. Unit Directors are notified by the Charge Card Program staff, OCon&PPM, when approving officials fail to complete the online approvals by established deadlines.

TIP: To approve all transactions at one time, click the Select All hyperlink. Then click the Verified or Approved button depending on your role. This feature can be especially useful for those units that have large FedEx statements.

6.6 Handling Disputed Items

When performing reconciliation, it is suggested that the **Comments** icon be used to enter information concerning a transaction being disputed. At a minimum the comments should contain the reason for the dispute, when it was initiated, and other pertinent information. Because SI does not adjust the monthly bill for disputed items, once comments are entered the transaction status should be changed to **Verified** by the cardholder. The approving official should also change the status to **Approved** when reviewing and approving the statement.

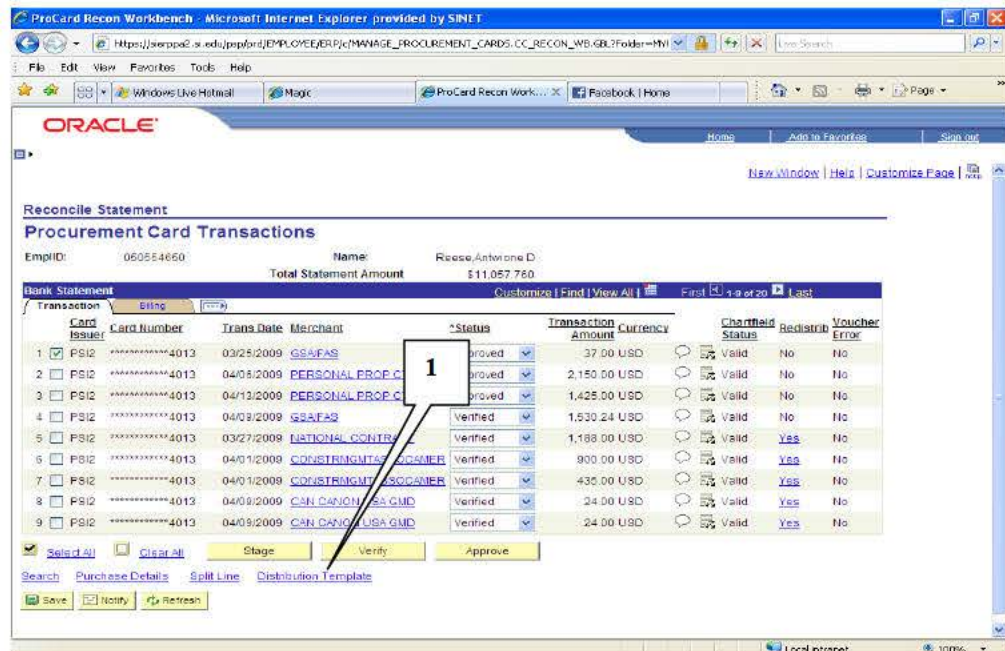
Set the status of the disputed transaction(s) to **Verified/Approved**.

1. Click .
2. Be sure to note the disputed item on your Purchase Card Transaction Log and the JPMC paper statement. JPMC requires the completion of their dispute form and then faxed to the number indicated on the form. Please be sure to fax a copy to the Charge Card Program staff as well, fax (202) 633-7319.

NOTE: Once a disputed item is resolved, if it results in a credit, please be sure to use the same chartfield as the original transaction.

6.7 Distribution Template Feature

The **Distribution Template** feature can be used to change the chartfield for all or selected statement lines.



6.7.1 To change the distributions for the selected transactions:

1. From the **Reconcile Statement** screen, select the transaction line number(s) that need to be changed, and then select the **Distribution Template** link.
2. At the **Distribution Template** screen, enter the complete chartfield (including the GL Unit SI000) by typing in the specific value or by clicking on the magnifying glass next to each chartfield element. Searches can be performed for a specific value by entering in specific numbers. Once found, click OK and the value will automatically be entered. When entering the project and activity ID information, the user must first enter the PC Bus Unit.

NOTE: Once the distribution is changed, the new distribution will be retained for the rest of the reconciliation session. Split distributions are allowed, and the split will be applied to each statement transaction by percentage.

Distribution Template screen

3. Click **OK** to return to the **Reconcile Statement** screen.

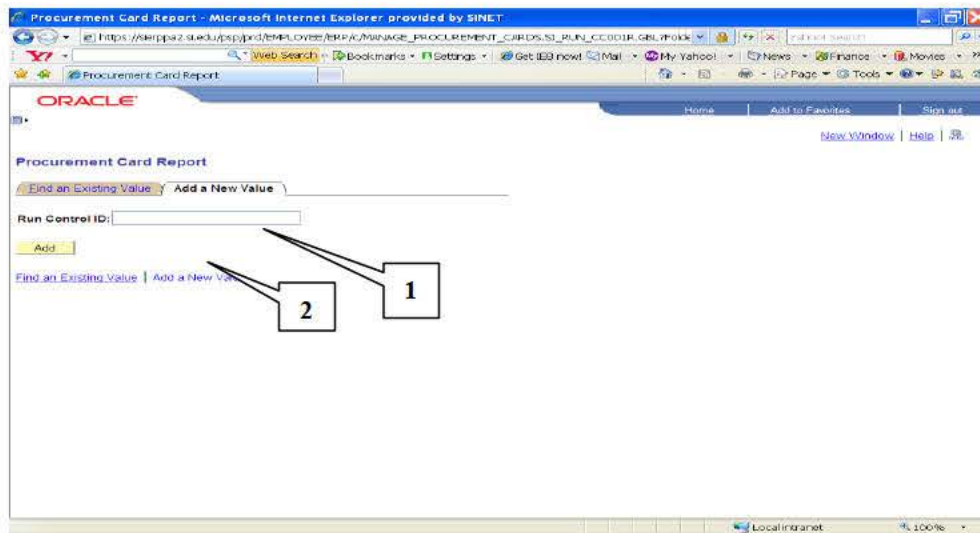
NOTE: If an error is made in the chartfield, for either an individual element or combination values (e.g., an incorrect fund value with a particular designated code), when saving changes an error message will be generated. **No transaction changes can be saved until the error is corrected.** The error message will indicate the line and distribution number in error. Errors in multiple lines are noted one at a time in line number order. See page [50](#) for an illustration of how this works.

6.8 Procurement/Travel Card Report

To run the **Purchase/Travel Card** report, from the main ERP menu, follow these menu steps:


- Click **Purchasing**
- Click **Procurement Cards**
- Click **Procurement Card Report**

The **Run Control** page is displayed.



1. Enter a **Run Control ID** (do not use spaces when creating).
 - TIP: First-time users will have to create a **Run Control ID** - **Run Control IDs** are used to save selection parameters. Use the **Find an Existing Value** tab to retrieve a specific **Run Control ID**
2. Select **Add**. The **Procurement Card** report page will then be displayed.

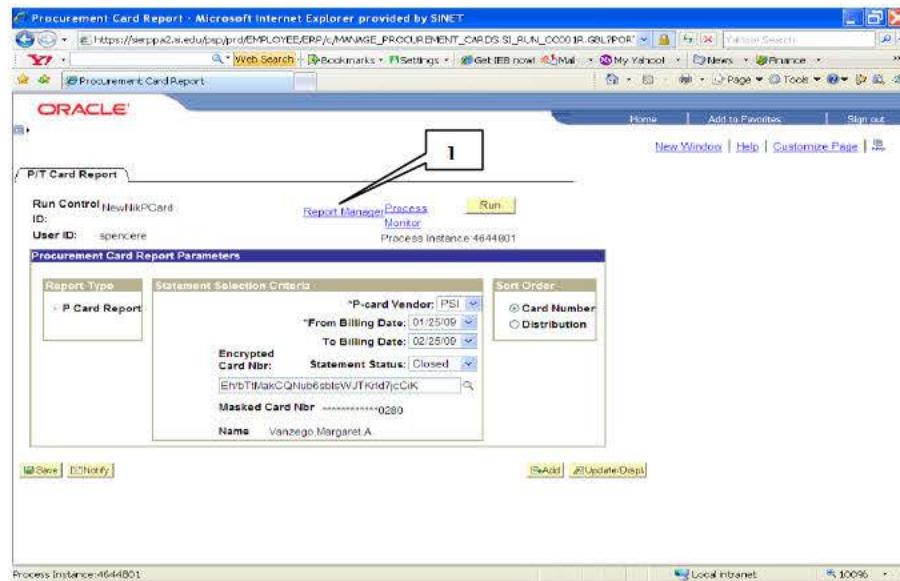
1. To run the *Procurement Card Report*, complete the following steps:

ID	Field Name	Field Definition
3	PCard Vendor	Select PS2 for SI, PST2 for STRI, or PSAO for SAO.
4	Billing Date	Select the billing (statement) date.
5	Encrypted Card Number	Delete the contents in this field and select the last 4 digits of your PCard number (or name) using the  to the right of this field. If you have or are responsible for many cards, you can create a separate Run Control ID for each additional card. Save your Run control before running the report.
6	Statement Status	Optional. Enter the status to limit the reports date to a single state (Approved, Closed, Staged, Verified).
7	Sort Order	The statement information can be sorted by card number (if you have or are responsible for many cards) or chartfields.

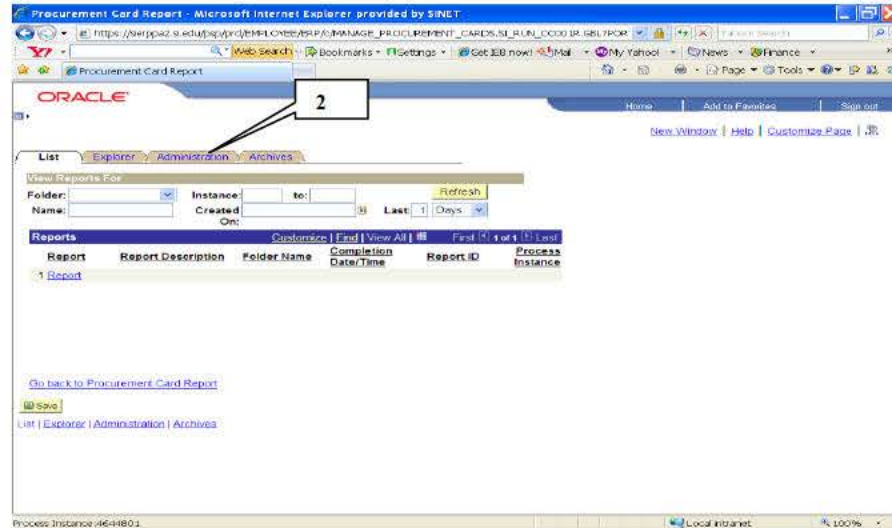
2. Select  and then click OK.

6.8.1 Viewing/Printing the Report

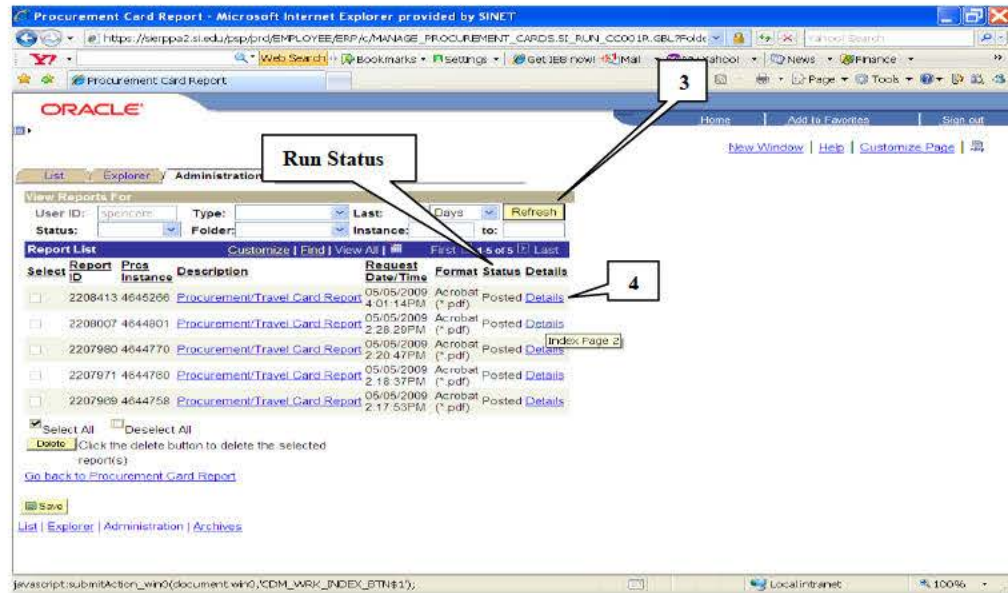
1. At the *P/T Card Report* screen, select the [Report Manager](#) link.



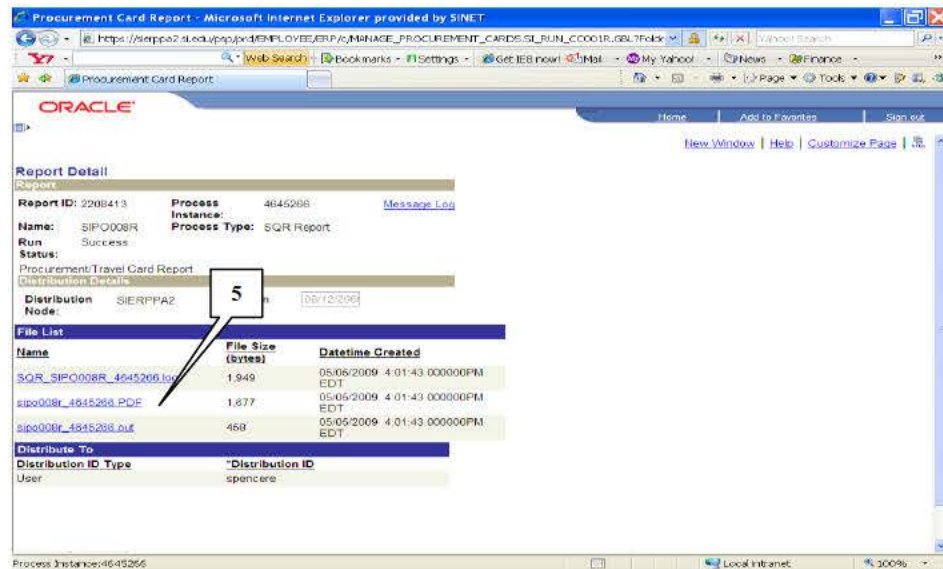
2. The *Report Manager* page is displayed. Select the [Administration](#) tab.

**Report Manager**

3. At the **Report List** page, click the **Refresh** button until the status of the Purchase/Travel Card Report is Posted.

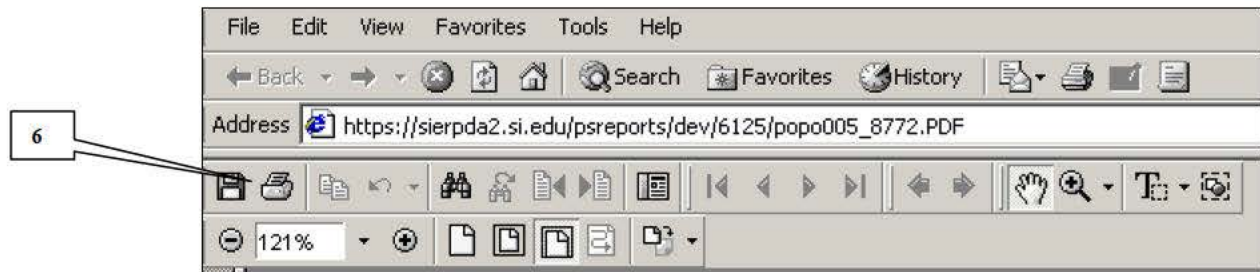
*Report List page*

4. Select **Details** (next to Purchase/Travel Card Report). The **Report Detail** screen will appear.

*Report Detail page*

5. Click on the * **.PDF** file. The P/T Card report will appear in Adobe Reader.

6. Select the printer icon to print the report.



6.9 Logging Out of PeopleSoft



Select **Sign out**.

CHAPTER 7.0: Additional Purchase Card Queries and Reports in ERP

7.1 Accessing Current Purchase Card Transactions in ERP Staging Table

Purchase card transaction files are received daily from JPMC and loaded into ERP staging tables. Effective October 2011, ERP functionality was enhanced to provide cardholders and approvers the ability to access (view) current purchase card transactions through access to the PCard Staging Table. This functionality is useful to determine whether a merchant has billed a cardholder for a recent order and may be used mid-billing cycle to monitor card activity and prepare for the monthly reconciliation process.

Once a user has defined the specific cardholder transactions and its time period, ERP will return the data results. This data may be exported into an Excel spreadsheet for use. Transactions loaded into the staging table are 'view only' and chartfield reallocation cannot occur until the monthly statement cycle is closed by JPMC (25th of each month) and staging table transaction data is transferred to the ERP Reconcile Statement module.

To access, view, and export PCard staging table data detailed purchase card information by department in PeopleSoft, follow these steps:

1. Login to ERP with your login ID and password.
2. At the **Menu** screen:
 - Click Purchasing
 - Click Procurement Card
 - Click Reconcile
 - Click View P-Card Staging Table Txns
3. The following screen will appear:

4. Define the search parameters by entering the Employee Name or Card number. **Note:** To view all staged transactions for the defined cardholder leave the Transaction Date fields blank and select **Search**. Otherwise refine date criteria and then select **Search**.
5. Staged transactions will appear. A portion of the screen is provided below:

Transaction Date	Posted Date	Standard Industry Code	Merchant	Reference Number	Transaction Amount	Currency Code	Merchandise Amt	File Name
10/05/2011	10/06/2011	7333	SEVERN GRAPHICS INC	55419371278169106999545	1,390.000	USD	1,390.00	GNS
10/04/2011	10/05/2011	2741	PETREE PRESS	55436871277172776522216	1,102.000	USD	1,102.00	GNS

6. Users may then download this data from ERP to Excel for unit use. A Total Transaction Amount is provided to assist in monitoring current account activity against a cardholder's monthly card credit limit.

7.2 Accessing Prior Purchase Card Statements

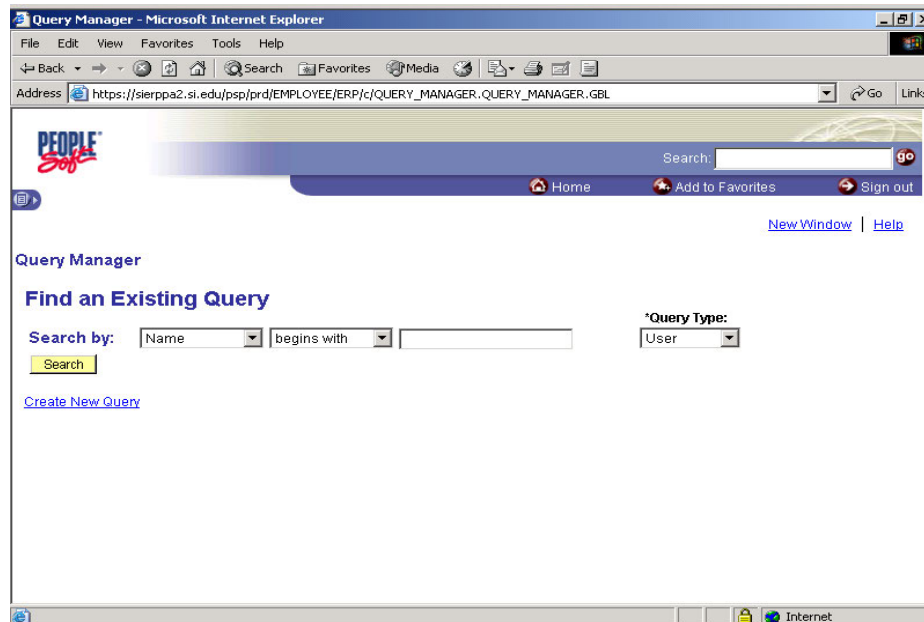
To access prior period purchase card statements in PeopleSoft, follow these steps:

1. Login to **ERP** with your login ID and password.

At the main **Menu** screen, follow these menu steps:

- Click Reporting Tools
- Click **Query**
- Click Query Manager

2. *Find an Existing Query* will appear on screen.



3. In the **Search by** section, type the letters **CC** in the **third (blank) box**, and then click on **Search**. All of the queries related to credit cards will appear. Many of these queries are restricted, however, the two queries that allow access to individual purchase card statements are:
- **CC TRANS DIST INFO3** –To view purchase card activity from one individual billing period.
 - **CC TRANS DIST MULTI PERIOD** –To view purchase card activity during multiple billing periods.
4. Choose a query and click **Run**, on the right side of the screen and in the same row/line as the desired query title.

NOTE: DO NOT CLICK ON THE ACTUAL TITLE – if this does occur, click Return to Search (down at the bottom of the screen) to take you back to Step 3 –then repeat Steps 4 and 5.

5. A screen similar to the following should then appear:

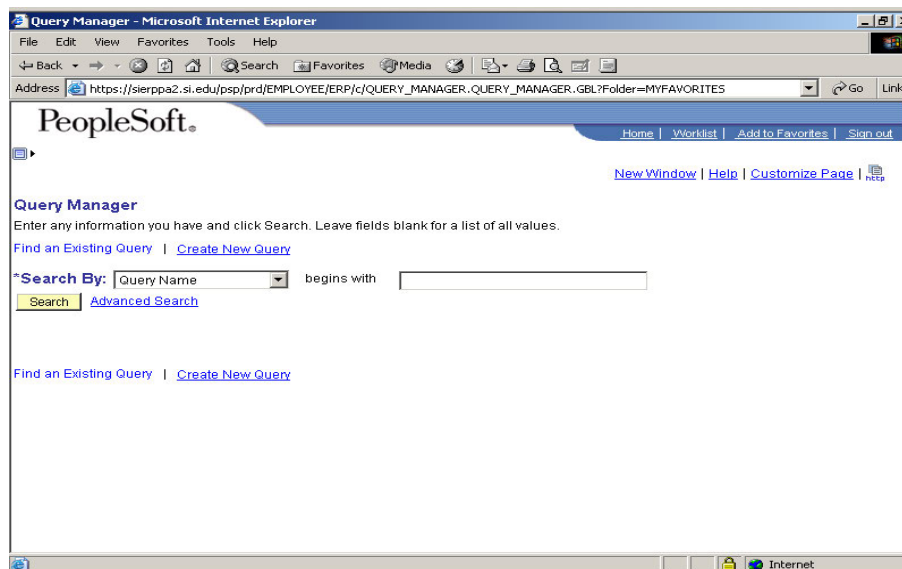
6. Enter the date for the statement period you would like to view (or range of dates if you are selecting the multiple period query).
 - Date must be entered as **MM/DD/YYYY** (e.g., **01/25/2003**)
 - Bill date is the same as the JPMC billing cycle end date (e.g., Queries entered as **10/25/2002**, will generate transactions from **09/26/2002 - 10/25/2002**).
7. Enter Credit Card number.
 - Enter the entire 16-digit credit card number; do not use spaces or dashes (e.g., **5562000000123456**).
8. Select view results and to see all transactions for a particular statement period(s) and credit card numbers entered. Information regarding each individual transaction will be shown including the chartfield the transaction was allocated to and the status of the transaction. Statuses are defined as follows:
 - **Closed** – transactions from a prior period statement
 - **Verified** – transactions that have been set for verification by cardholder.
 - **Approved** – transactions that have been approved by the approving official.
 - **Staged** – transactions that are new and have not been reviewed yet.
9. To download the results in an Excel Spreadsheet or CSV Text File, click on the appropriate option listed at the top of the page. The results are most easily printed from an Excel spreadsheet. CSV (Comma Separated Values) files are used to import the data to other applications, such as Microsoft Access. *If printing the results is not required, click the X to close the window which is located in the top right corner of the screen).*

10. To download, at the file Download menu, click save and then choose the desired directory to save the file. Change the file name as desired and then click save again. This returns the user to the *Find An Existing Query* screen. To return to the main menu in PeopleSoft, click [Home](#) on the *PeopleSoft* menu (not the home key on the Internet Explorer toolbar).

7.3 Accessing Purchase Card Transaction Detail by Chartfield

To obtain detailed purchase card transaction information specifically by chartfield in PeopleSoft, follow these steps:

1. Login to PeopleSoft with your login ID and password.
2. At the *Menu* screen:
 - Click Reporting Tools
 - Click [Query](#)
 - Click Query Manager
3. The user will view the *Query Manager* screen
4. In the [Search by](#) section, find [Query Name](#). In the [Begins With](#) section, type CC and then click on [Search](#). Once the *Search Results* appears, click on [Run to HTML](#) link (on right) of the query titled [CC PCARD DISTRIB DETAIL](#) NOTE: **DO NOT CLICK ON THE ACTUAL TITLE** –Click [Return to Search](#) (down at the bottom of the screen). to return to Step 3. Repeat Step 4.



5. The chart below will appear.

- Enter a valid **Billing Date**. It must be the 25th day of a month.
- Enter desired value for each chartfield, or N/A in chartfields where any value is acceptable. Every chartfield value must be populated.

6. Click on **View Results**. Each transaction that was allocated to that particular chartfield will appear.
7. To download the results in an Excel Spreadsheet or CSV Text File, click on the appropriate option listed at the top of the page. The results are most easily printed from an Excel spreadsheet. CSV (Comma Separated Values) files are used to import the data to other applications, such as Microsoft Access. ***If printing the results is not required click the X to close the window which is located in the top right corner of the screen.***
- When choosing to download, at the file Download menu, click save and choose the directory to save the file in. Change the file name as desired and then click save again. Click close to close the file download menu.
 - This returns the user to the query results. Click **X** to close the window (located in the top right corner) and return to Find An Existing Query.
 - To return to the main menu in PeopleSoft, click **Home** on the PeopleSoft menu (not the home on the Internet Explorer toolbar).

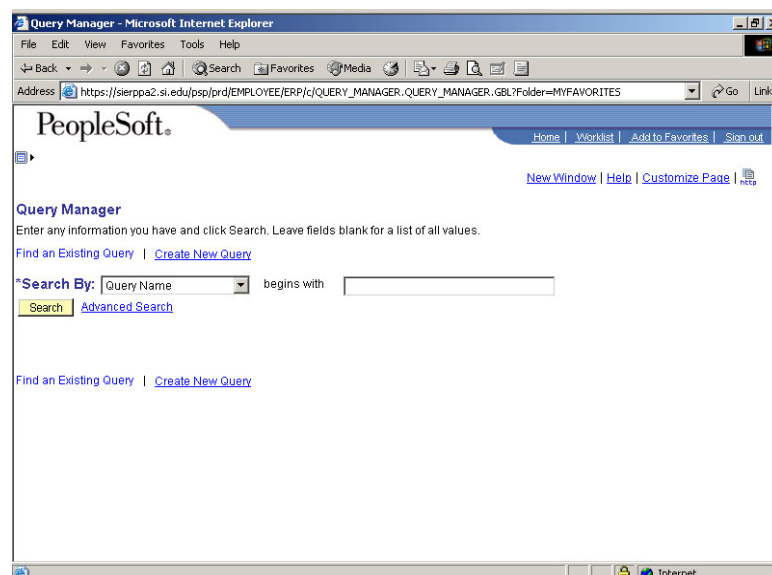
7.4 Reviewing Personal Property Purchases and Expenses

A Smithsonian Institution (SI) Personal Property Management Bulletin (08-002) was issued specifically to Accountable Property Officer (APOs), Procurement Delegates, Purchase Cardholders and Approving Officials. This Bulletin was issued to inform SI employees that have responsibilities in the processes for acquiring and accounting for personal property assets that two PeopleSoft queries are available to identify purchases of personal property assets and expensed items.

The queries can also assist with verifying that the appropriate object class/account code combinations are used correctly in the chartfield for both Purchase Order and Purchase Card transactions (account codes 6173, 6174 and 6175 for personal property assets) and 6100 for expensed items).

To access detailed purchase card information on Personal Property Purchases and Expenses in PeopleSoft, follow these steps:

1. Login to PeopleSoft with your login ID and password.
2. At the main **Menu** screen, follow these menu steps:
 - Click Reporting Tools
 - Click **Query**
 - Click Query Manager
3. The **Query Manager** page will appear on screen.
4. In the **Search by** section, find **Query Name**. In the **Begins With** section, type **CC** and then click on **Search**. Once the **Search Results** appears, click on **Run to HTML** link (on right) of the query titled **CC PCARD DIST DETAIL MULDT_NEW**
NOTE: **DO NOT CLICK ON THE ACTUAL TITLE** – Click **Return to Search** (down at the bottom of the screen) to return to Step 3. Repeat Step 4.



5. The chart below will appear.

- Enter desired value for each chartfield, or N/A in chartfields where any value is acceptable. Every chartfield value must be populated.
- To view a specific statement period(s) enter a valid **Billing Date**.
- Starting billing date and ending billing date as must be entered as **MM/DD/YYYY** (e.g., **06/25/2010 – 8/25/2010**).
- Bill date is the same as the JPMC billing cycle end date (e.g., entering **the date above**, will generate transactions from **the June through August statement period**).

The screenshot shows a web browser window displaying the PeopleSoft Public Card Disbursement Query screen. The address bar shows the URL: https://sierppa2.si.edu/psc/prd_1/EMPLOYEE/ERP/q?iCAction=ICQryNameURL=PUBLIC_CC_PCARD_DIS. The form contains the following fields:

- Enter Fund: [text box]
- Enter Bud Ref: [text box]
- Enter Dept: [text box]
- Enter Account: [text box]
- Enter Class: [text box]
- Enter Program: [text box]
- Enter Project: [text box]
- Enter Activity: [text box]
- Enter Starting Bill Date: [text box]
- Enter Ending Billing Date: [text box]

Below the form is a yellow button labeled "View Results". At the bottom of the screen, there is a table header with the following columns: ID, Issuer, Account, Trans, Trans, Line, Date/Time, Pooled, Bill, Status, SIC, Merchant, Reference, PO, Type, Distribution, Fund, Bud, Dept, Account, Class, Program, Project, Amount, PC, Bus, Unit.

6. Click on **View Results**. Each transaction allocated to that particular chartfield will appear.
7. To download the results in an Excel Spreadsheet or CSV Text File, click on the appropriate option listed at the top of the page. The results are most easily printed from an Excel spreadsheet. CSV (Comma Separated Values) files are used to import the data to other applications, such as Microsoft Access. ***If printing the results is not required, click the X to close the window which is located in the top right corner of the screen.***
- To download, at the file Download menu, click save and choose the desired directory to save the file in. Change the file name as desired and then click save again. Click close to close the file download menu.
 - This returns the user to the query results. Click **X** to close the window (located in the top right corner) and return to Find An Existing Query.

- To return to the main menu in PeopleSoft, click **Home** on the PeopleSoft menu (not the home on the Internet Explorer toolbar).

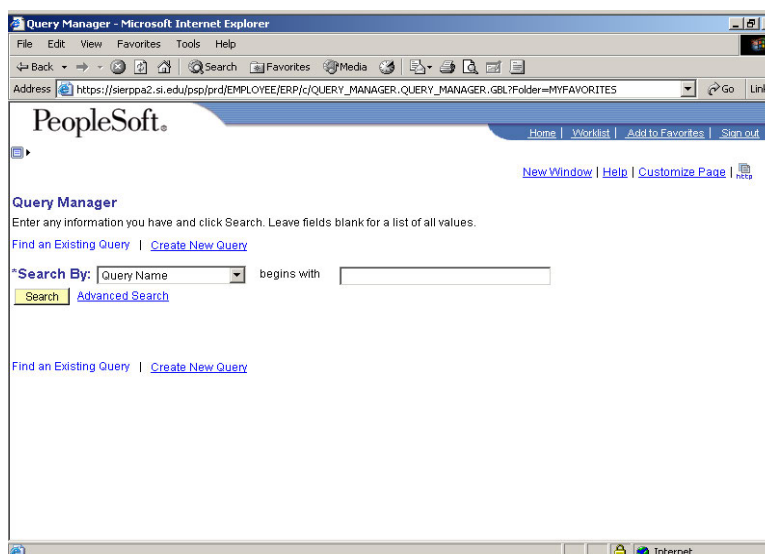
7.5 Reviewing Purchase Card Details for Non-Purchase Cardholders and Approvers

A query was developed specifically for budget and finance personnel that are NOT Purchase Cardholders or Approving Officials. Those employees will be able to utilize this query to retrieve the breakdown of purchase card transactions for departments in which they are responsible. Access to the query is based upon their ERP User ID profile and departmental access.

Purchase Cardholders and Approvers should continue to use the CC_PCARD_DISTTRIB_DETAIL query to obtain detail results of their transactions.

To access detailed purchase card information by department in PeopleSoft, follow these steps:

1. Login to PeopleSoft with your login ID and password.
2. At the **Menu** screen:
 - Click Reporting Tools
 - Click **Query**
 - Click Query Manager
3. The **Query Manager** will appear on screen.
4. In the **Search by** section, find **Query Name**. In the **Begins With** section, type **CC** and then click on **Search**. Once the **Search Results** appears, click on **Run to HTML** link (on right) of the query titled **CC_PCARD_DEPT_DETAILS**. NOTE: **DO NOT CLICK ON THE ACTUAL TITLE** –Click **Return to Search** (located at the bottom of the screen) return to Step 3. Repeat Step 4.



5. The chart below will appear.

- Enter a valid **Billing Date**. It must be the 25th day of a month.
- Enter desired value for each chartfield, or N/A in chartfields where any value is acceptable. Please note: *PLEASE NOTE: Bill Date and Department fields are required.*

The screenshot shows a web browser window with the URL https://slcrppa2.sl.edu/psc/prd_2/EMPLOYEE/ERP/q?iCAction=ICQryNameURL=PUBLIC_CC_PCARD_DEPT_DE. The form contains the following fields:

- Bill Dt:
- Enter Fund:
- Enter Bud Ref:
- Enter Dsg:
- Enter Dept:
- Enter Account:
- Enter Class:
- Enter Program:
- Enter Project:
- Enter Activity:

Below the form is a yellow button labeled "View Results". At the bottom of the page is a table header with the following columns:

Card Number	Cardholder Name	Card Issuer	Transaction Number	Transaction Date	Posting Date	Billing Date	CC Status	SIC Code	Merchant Name	Reference Number	Distribution Line	Fund	Bud Ref	Dsg	Dept	Account	Class	Program	Project	Amount	PC Bus Unit	Active
-------------	-----------------	-------------	--------------------	------------------	--------------	--------------	-----------	----------	---------------	------------------	-------------------	------	---------	-----	------	---------	-------	---------	---------	--------	-------------	--------

6. Click on **View Results**. Each transaction allocated to that particular chartfield will appear.
7. To download the results in an Excel Spreadsheet or CSV Text File, click on the appropriate option listed at the top of the page. The results are most easily printed from an Excel spreadsheet. CSV (Comma Separated Values) files are used to import the data to other applications, such as Microsoft Access. If printing the results is not required, click the X to close the window which is located in the top right corner of the screen.
- To download, at the file download menu, click save and choose the directory to save the file in. Change the file name as desired and then click save again. Click close to close the file download menu.
 - This returns the user to the query results. Click **X** to close the window (located in the top right corner) and return to Find An Existing Query.
 - To return to the main menu in PeopleSoft, click **Home** on the PeopleSoft menu (not the home on the Internet Explorer toolbar).

7.6 Obtaining Purchase Card Voucher Information for Service Requests for Post-Voucher Funding Changes

A public Query Manager query, [CC_SVC_REQUEST_VCHR_DATA](#), is available to SI unit staff that requires voucher information for completing a Service Request Form to make necessary post-voucher changes.

The query requires the following inputs:

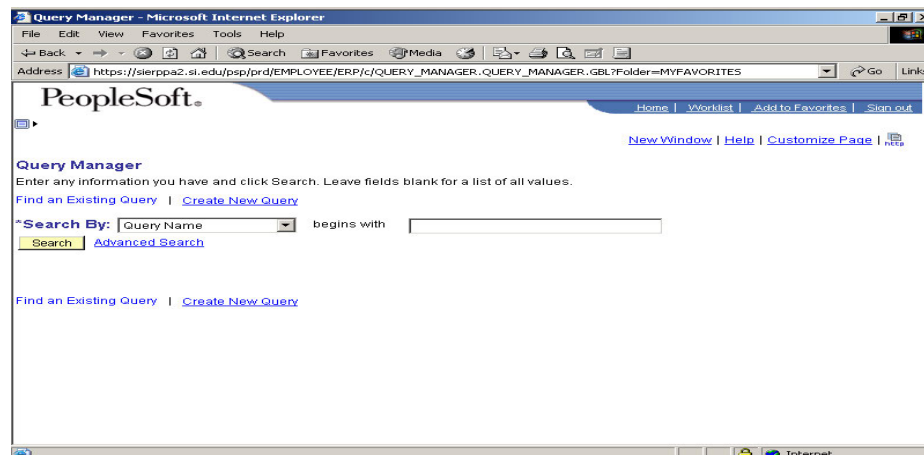
- The Statement Billing Date for the purchase card expenditure
- A value for each of the original chartfields used in funding the purchase card expenditure (“N/A” or “n/a” (without the quotes) must be entered for any chartfield values that are skipped)

The query returns:

- The voucher ID for the purchase card voucher
- The voucher line number(s) and distribution chartfield/amount values for all voucher lines matching the chartfield values that the user input to the query.

To access the required voucher information with the query, follow these steps:

1. Login to PeopleSoft with your login ID and password.
2. At the **Menu** screen:
 - Click Reporting Tools
 - Click [Query](#)
 - Click Query Manager
3. The **Query Manager** page will appear on screen.
4. In the [Search by](#) section, find [Query Name](#). In the [Begins With](#) section, type CC and then click on [Search](#). Once the **Search Results** appears, click on [Run to HTML](#) link (on right) of the query titled [CC_SVC_REQUEST_VCHR_DATA](#). NOTE: **DO NOT CLICK ON THE ACTUAL TITLE** — Click [Return to Search](#) (located at the bottom of the screen) to return to Step 3. Repeat Step 4.
- 5.



PURCHASE CARD PROGRAM ADDITIONAL PURCHASE CARD QUERIES AND REPORTS IN PEOPLESOFT

6. A chart similar to the example on the following page will appear. The example shows how the query can be used to locate the purchase card voucher ID and voucher line numbers for the charges. (This example was copied from an actual email request from a unit purchase card approving official on 9/28/2007):

7/3/2007	APPLE STORE #R036	ARLINGTON VA	229.95
801 0000 300480 563080 6100 3104			

7/3/2007	APPLE STORE #R036	ARLINGTON VA	759.90
801 0000 300480 563080 6100 3103			

The voucher information for this example can be found by running the query.

CC_SVC_REQUEST_VCHR_DATA - Pcard service rqst vchr data

BILLING DATE: 07/25/2007

FUND: 801

BUDGET REF: 0000

DSGC: 300480

DEPT: 563080

ACCOUNT: 6100

CLASS: NIA

PROGRAM: 3300

PROJECT: NIA

ACTIVITY ID: NIA

View Results

Download results in: [Excel Spreadsheet](#) [CSV Text File](#) (1 kb)

View All

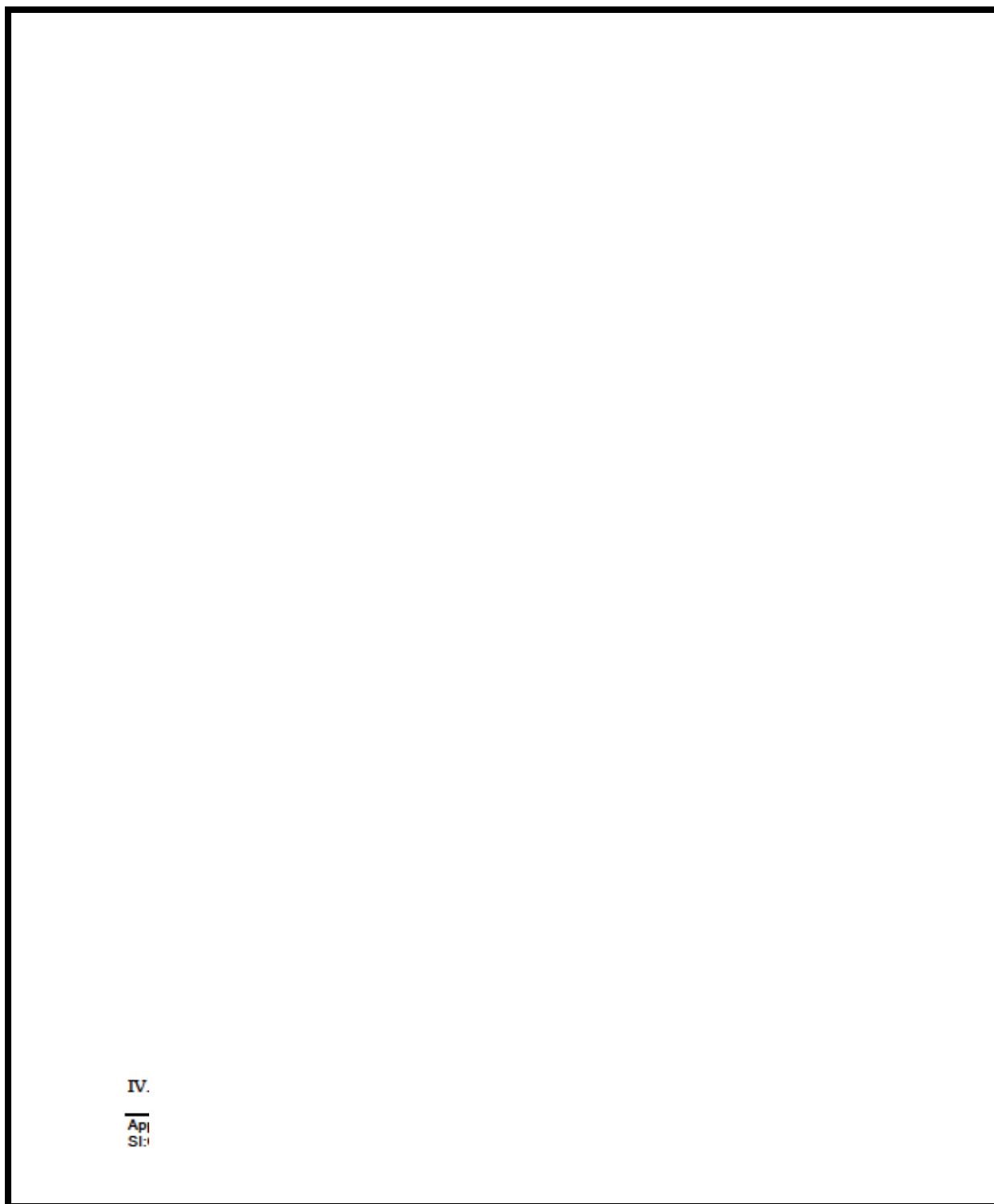
Credit Card Vendor	Voucher ID	Voucher Line Number	Distribution Line Number	Distribution Amount	Fund	Bud Ref	Dsgc	Dept	Account	Class	Program	Project	Activity	Count - Ignore
1 PSI	00391253	179	1	\$260.75	801	0000	300480	563080	6100	2414	3300			7926
2 PSI	00391253	1972	1	\$229.95	801	0000	300480	563080	6100	3104	3300			7926
3 PSI	00391253	1973	1	\$759.90	801	0000	300480	563080	6100	3103	3300			7926
4 PSI	00391253	2286	1	\$116.86	801	0000	300480	563080	6100	2333	3300			7926

The voucher ID for these charges is 00391253, and the voucher line numbers are 1972 and 1973.

Because the query shows no sensitive card number data, there is currently no security on it. Anyone with an ERP login who can access Query Manager is able to run this query.

Exhibit 322-2-A: Completing the JPMorgan Chase Purchase Card Application

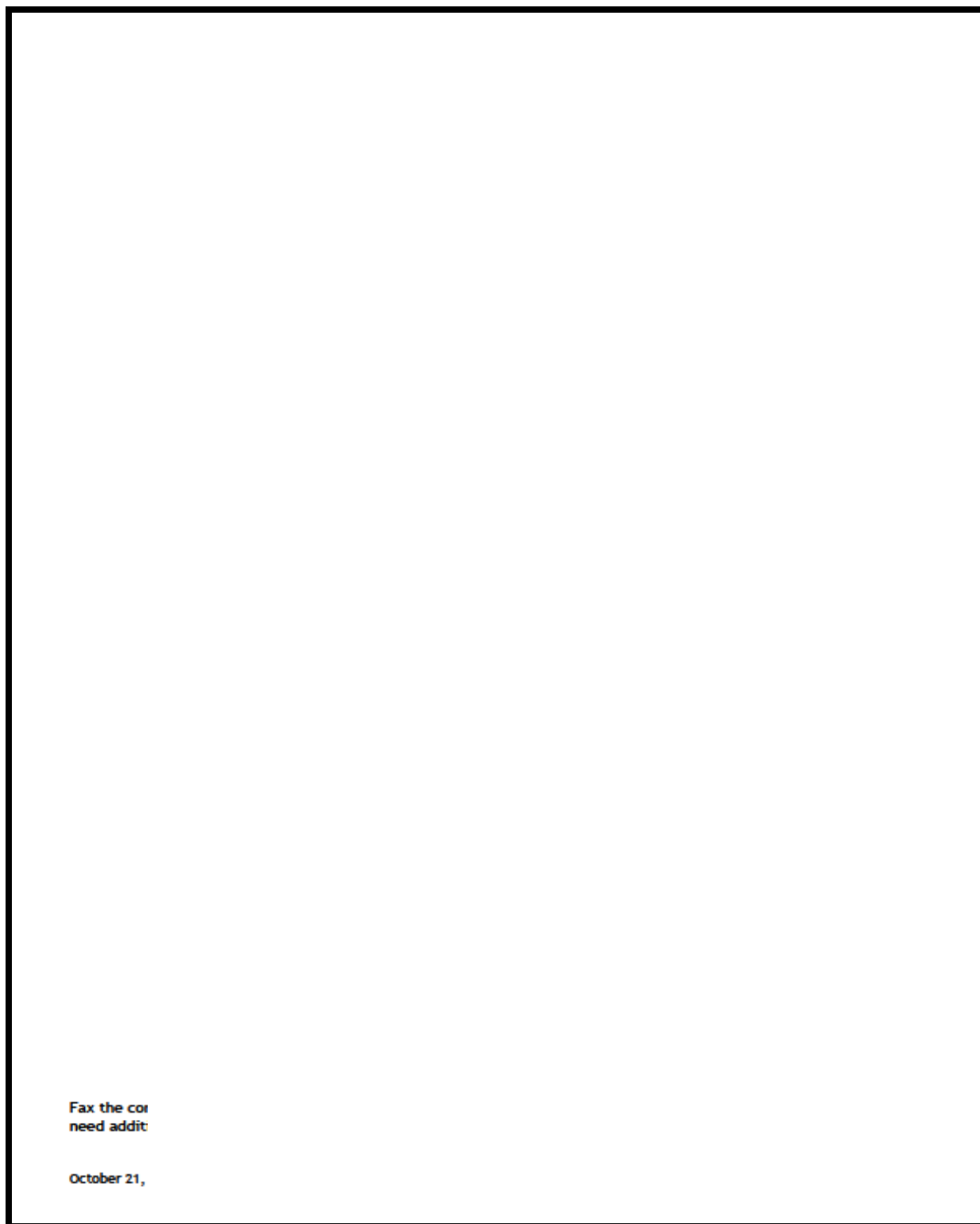
This form is available on Prism from the [OCon&PPM Forms and Reference page](#).



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Exhibit 322-2-B: JPMorgan Chase Purchase Card Application

This form is available on Prism from the [OCon&PPM Forms and Reference page](#).

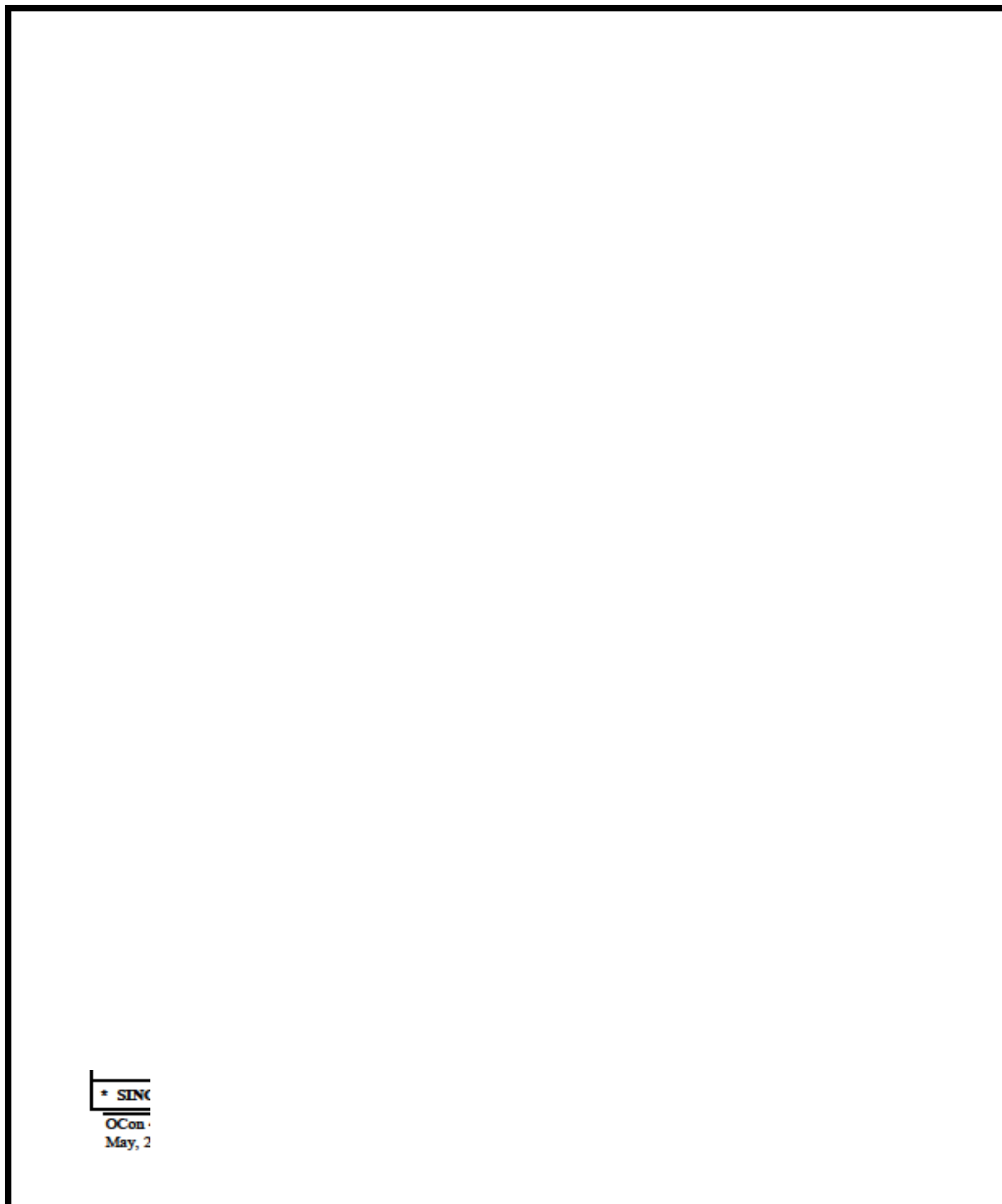


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October 21,

Exhibit 322-2-C: **Applications for Purchase Cardholder and Approving Official Authority**

This form is available on Prism from the [OCon&PPM Forms and Reference page](#).



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May, 2

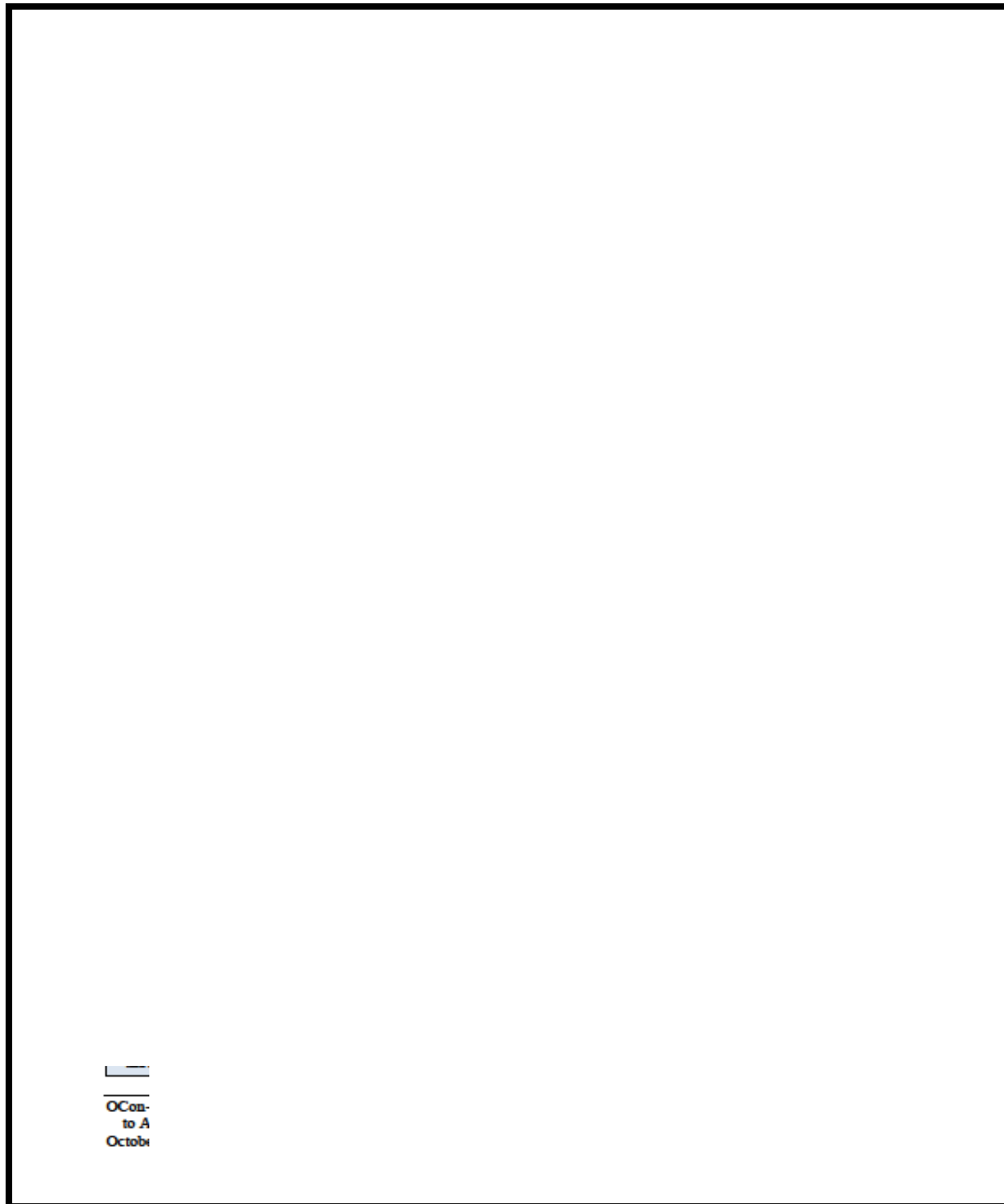
Exhibit 322-2-D: Approving Official Application and Instructions

This form is available on Prism from the [OCon&PPM Forms and Reference page](#).



**Exhibit 322-2-E: Request to Waive Restriction on the Use of Purchase Cards to Acquire
Sensitive Personal Property Items**

This form is available on Prism from the [OCon&PPM Forms and Reference page](#).




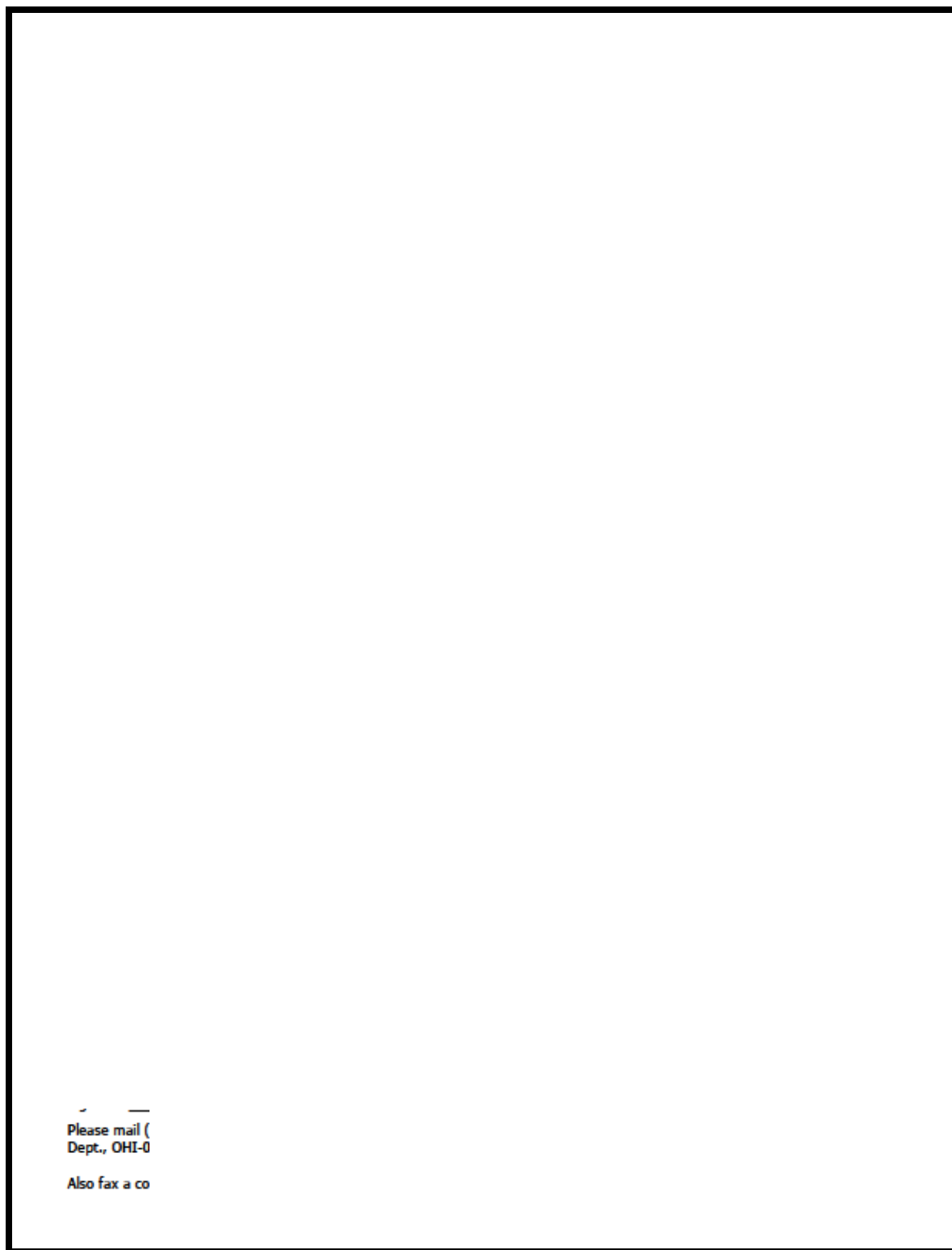

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Exhibit 322-2-F: JPMorgan Chase Dispute Form

This form is available on Prism from the [OCon&PPM Forms and Reference page](#).



Please mail ()
Dept., OHI-0
Also fax a co

This form is available on Prism from the [OCon&PPM Forms and Reference page](#).

SD 322, Charge Card Program
Part 2 — Purchase Card Program — Desk Reference
and Training Manual



SMITHSONIAN DIRECTIVE 323,
January 25, 2010,
Last Date Declared Current: February 14, 2012

SMITHSONIAN INSTITUTION SPENDING POLICY FOR FEDERAL APPROPRIATIONS AND TRUST FUNDS

Purpose	1
Background	2
Authorities and Citations	2
Applicability	3
Guiding Principles	3
Use of Federal Appropriations	4
Use of Trust Funds	5
The Necessary Expense Rule	6
Responsibility for Determining What Constitutes a Necessary Expense	7
Requesting Clarification of Smithsonian Spending Policies	8
Using the Correct Funding Sources for Each Necessary Expense	8
Reporting Potential or Suspected Misuse of Smithsonian Institution Funds	9
Violations and Penalties	9
Responsibilities	10
Records Retention	13
<i>Smithsonian Use of Funds Handbook</i>	**

** The *Use of Funds Handbook* is posted separately to the Directives
Section of Prism, under SD 323

Purpose

This Smithsonian directive (SD) establishes policy governing the obligation and expenditure of federal appropriated and trust funds. This SD sets forth the general policies related to the Institution's spending policies, and the *Smithsonian Institution Use of Funds Handbook* (that accompanies this SD) implements the spending policies and includes specific rules, guidelines, and procedures for how Smithsonian funds can and cannot be used.

Purpose (continued) This directive is a companion to SD 305, *Administrative Control of Funds*. Whereas SD 305 restricts obligations and expenditures to the amounts available in federal appropriations and trust fund accounts, SD 323 and the implementing *Handbook* define how the Institution can use available resources to execute the Smithsonian mission.

Background The Smithsonian relies on generous financial support from both the public and private sectors to execute its mission to increase and diffuse knowledge. The Institution receives funds from federal appropriations, Government grants and contracts, and contributions from the private sector. In addition to these sources, the Institution also generates its own revenue through a variety of activities such as business activities; special events; and customized public program activities.

To carry out its mission, the Smithsonian uses both federal appropriations and trust funds. Regardless of the source, all funds available to the Institution are dedicated to public purposes, and the Smithsonian is responsible for the proper management and stewardship of all the funds it receives.

The Governance Committee's *Report to the Board of Regents* in June 2007 established a set of guiding principles to provide direction to Smithsonian staff to carry out the Smithsonian mission. The first principle, *Our Operations and Activities will Reflect our Status as a Public Trust Administered on Behalf of the American People*, forms the foundation upon which the Institution's spending policy was built.

Authorities and Citations The federal statutes and other authorities that govern the Smithsonian's expenditure of funds are too numerous and changeable to list. The Smithsonian's enabling legislation (20 *United States Code* [U.S.C.] 41 et. seq.) includes certain expenditure authorities and limitations.

**Authorities
and Citations**
(continued)

With regard to the expenditure of federal appropriations, the annual legislation by which the Smithsonian receives its appropriations, as well as Titles 3 and 31 of the U.S.C. and various other federal statutes include authorizations and limitations on the use of federal appropriations. The instruments pursuant to which the Smithsonian receives U.S. federal grants and contracts and other interagency transfer agreements also govern the expenditure of funds, and those instruments may incorporate other federal statutory and regulatory standards. The Government Accountability Office (GAO) publishes *Principles of Federal Appropriations Law* (<http://www.gao.gov/special.pubs/redbook1.html>) (“Red Book”), which is a treatise that describes federal appropriations law and provides case citations.

Smithsonian trust funds are governed by different standards. As an organization that is recognized by the Internal Revenue Service (IRS) as an education organization exempt from income tax under Section 501 (c)(3) of the Internal Revenue Code, the Smithsonian is obligated to comply with certain expenditure standards for its trust funds that are promulgated in Title 26 of the U.S.C. and by IRS regulations implementing these statutes. The Institution also follows certain uniform acts and best practices in the nonprofit community. In addition, instruments pursuant to which the Smithsonian receives funds, such as gifts, grants, and contracts, may include other expenditure conditions and/or restrictions.

Applicability

All Smithsonian museums, research centers, programmatic centers, and offices, including Smithsonian Enterprises (SE), the Office of the Regents, and the Office of the Inspector General (OIG), are subject to the provisions of this directive.

Guiding Principles

1. The Institution will be guided by the principles of the federal sector in the conduct of its activities whenever appropriate and consistent with its mission and trust responsibilities. In all other cases,

Guiding Principles
(continued)

the Institution will follow the principles and best practices for fiduciary stewardship in the nonprofit sector.

2. To sustain public confidence in the integrity of the Smithsonian's operations, the Institution will use all funds, regardless of the source, to execute the Smithsonian mission in a manner consistent with best practices for the federal and/or nonprofit sectors, and in the most cost-effective and reasonable manner possible.
3. The Institution will establish and maintain appropriate accounting and internal controls to ensure the legality, reasonableness, and appropriateness of all payments and expenditures.
4. Each use of Smithsonian funds will constitute a "necessary expense." A necessary expense is an allowable expenditure and one that has an obvious and legitimate connection to the Institution's mission.
5. The primary purpose of all Smithsonian expenditures is to benefit the Institution. Smithsonian funds may be used for items and services that otherwise would be considered personal in nature only when the primary benefit accrues to the Institution, notwithstanding a collateral benefit to an employee.

Use of Federal Appropriations¹

Smithsonian appropriations are legally available only for the purposes for which the funds were appropriated. In some instances, the Institution has been provided special statutory authority to use federal appropriations in ways that might otherwise not be authorized.

In all cases, the Institution applies the federal "necessary expense rule" to determine when appropriations may be used for specific purposes.

¹ For the purpose of this directive, federal appropriations refer to funds appropriated by the Congress to the Smithsonian Institution.

**Use of Federal
Appropriations**
(continued)

Please refer to the “Necessary Expense Rule” section for additional information.

The use of appropriated federal funds must always comply with federal appropriation law. These rules are documented by the GAO in Volume I, Chapter 4 (Availability of Appropriations: Purpose) of the Red Book.

Use of Trust Funds

The Institution has significant leeway and flexibility in using its trust funds to accomplish its mission. Federal appropriation laws and regulations do not apply, nor extend, to Smithsonian trust funds. However, when the Smithsonian receives Government grants and contracts from U.S. federal agencies, those grant and contract documents may require compliance with certain federal appropriation laws among the terms of the grant or contract. As with any other third-party restriction on the uses of trust funds, the Smithsonian will comply with those laws as a term of those Government grants and contracts. For clarification, funds received by the Smithsonian from other U.S. federal agencies under Interagency Transfer Agreements are not considered Government grants and contracts but may also require compliance with applicable federal laws. The laws which apply will depend on the authority under which the money was transferred (e.g., the Economy Act or other federal authority), which may or may not be appropriation laws.

The Institution has elected to use the necessary expense rule for its trust funds to ensure that trust funds are expended for appropriate purposes. For trust funds received from external sources (donors or sponsors), the necessary expense rule also requires that the purpose of obligations and expenditures complies with all restrictions and conditions imposed by the donor or sponsor on the use of funds. Please refer to the “Necessary Expense Rule” section for additional information.

The Necessary Expense Rule

To be considered a necessary expense of the Smithsonian, each expenditure must meet both of the following two rules:

1. The expenditure furthers the Smithsonian mission
 - a. The Institution's mission is defined in documents such as, but not limited to, the annual appropriations, enabling legislation, the Smithsonian Strategic Plan, the Smithsonian annual performance plans, the Institution's annual goals and objectives, the federal budget request to Congress, and other lower-level (unit-specific and functional) supporting strategic and performance plans.
2. The expenditure is an allowable expense
 - a. A **federal expense** is allowable when it is reasonably related to the purpose that Congress intended the appropriation to fulfill, not prohibited by law, and not within the scope of another appropriation.
 - i. Federal appropriation "rules" are documented in the Red Book
 - ii. The rules are numerous and cannot all be captured in this directive. However, expenses about which questions arise most frequently are described in the *Smithsonian Institution Use of Funds Handbook*, which is posted to the Directives section of Prism.
 - b. A Smithsonian **trust expense** is allowable when *at least one* of the following conditions is met:
 - i. Federal funds can be used for the same purpose
 - ii. The expense represents an ordinary cost commonly incurred by nonprofit organizations with missions similar to the Smithsonian, including activities such as but not limited to

**The Necessary
Expense Rule**
(continued)

advisory boards; development and fund raising; official representation; and special events

iii. For businesses operated by the Smithsonian, the expense represents an ordinary cost commonly incurred by that type of business activity in the commercial, federal or nonprofit sector

c. The expenses about which questions arise most frequently are described in the *Smithsonian Institution Use of Funds Handbook*, which is posted to the Directives section of Prism.

**Responsibility
for Determining
What Constitutes
a Necessary
Expense**

By way of this directive:

- the Secretary of the Smithsonian has delegated responsibility for determining what constitutes a necessary expense to each Smithsonian director (for his or her unit), and to the Secretary's direct reports
 - the Chair, Smithsonian Board of Regents, has delegated responsibility for determining what constitutes a necessary expense for the Office of the Inspector General to the Smithsonian Inspector General and for the Office of the Regents to the Chief of Staff to the Board of Regents
1. Persons responsible for making fund determinations are expected to:
- a. apply sound judgment when making decisions to spend Smithsonian funds
 - b. ensure that costs are reasonable
 - c. comply with all aspects of this spending and use of funds policy

**Responsibility
for Determining
What Constitutes
a Necessary
Expense** (continued)

- d. comply with all fiduciary aspects of the Institution's *Statement of Values and Code of Ethics*, which is available on Prism
 - e. establish procedures to implement this spending and use of funds policy
 - f. seek guidance or advice from the Office of Planning, Management and Budget (OPMB) when questions arise
2. In those instances when a particular use of funds is questioned, the Under Secretary for Finance and Administration/Chief Financial Officer (CFO) will evaluate the expenditure to determine whether the expense complied with the Institution's necessary expense rule.
3. If a use of Smithsonian funds is found to be unauthorized because it did not meet the necessary expense rule, the individual(s) responsible for incurring the expense may be required to reimburse the Institution. Further disciplinary action may be taken in accordance with the "Violations and Penalties" section of this SD. As a reminder, an expense is considered necessary when it furthers the Smithsonian mission and is otherwise allowable.
-

**Requesting
Clarification
of Smithsonian
Spending Policies**

If a proposed use of federal or trust funds does not appear to fit under or be authorized by this directive or the *Smithsonian Use of Funds Handbook*, Smithsonian personnel should contact their supervisor, and then, if necessary, their unit director or OPMB for further guidance and advice. When necessary, OPMB will consult with staff from the Office of the General Counsel to provide consistent and accurate advice.

**Using the Correct
Funding Sources
for Each Necessary
Expense**

It is the responsibility of each Smithsonian director and those individuals who have been delegated authority to obligate and expend Smithsonian funds (under SD 305, *Administrative Control of Funds*) to assign all costs to an appropriate funding source at the time the original obligation is made, or when the expenditure is incurred.

**Reporting Potential
or Suspected Misuse
of Smithsonian
Funds**

Employees should report any potential or suspected violations of the Institution's spending policies outlined in this directive and the *Smithsonian Use of Funds Handbook* through their chains of command or directly to a manager in the Office of the Under Secretary for Finance and Administration/Chief Financial Officer.

Employees who believe they are being pressured to acquire goods or services that do not constitute a valid necessary expense in accordance with this directive should immediately seek assistance from a senior agency official in their chains of command or a manager in the Office of the Under Secretary for Finance and Administration/Chief Financial Officer.

Individuals with knowledge of a possible violation of this policy may also use the Smithsonian Inspector General's hotline at Oighotline2@oig.si.edu or [Http://prism.si.edu/oig/form.asp](http://prism.si.edu/oig/form.asp) to report their concern or forward information anonymously.

**Violations
and Penalties**

Failure to comply with this policy can result in penalties defined in SD 305 when SI funds are used for a purpose other than that allowed for in budget allocation letters, donor gift agreements, grant/contract awards, internal advance agreements, interagency transfer agreements, and similar funding agreements.

Failure to comply with provisions of Office of Management and Budget (OMB) Circular A-110 (*Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations*), A-122 (*Cost Principles for Non-Profit Organizations*), and A-133 (*Audits of States, Local Governments, and Non-Profit Organizations*) is considered a violation of this policy and SD 305, *Administrative Control of Funds*, for Fund 802 and Fund 803 awards. The penalties defined in SD 305 will be applied.

When the policies defined in this directive and the accompanying *Use of Funds Handbook* are not followed as part of a transaction, and this also results in

**Violations
and Penalties**
(continued)

a failure to comply with the Institution's Standards of Conduct, a violation of both this directive and SD 103, *Smithsonian Institution Standards of Conduct*, is considered to have occurred and the penalties defined in SD 103 will be applied.

If it is discovered that a purchase cardholder used the purchase card inappropriately and in a manner that is a violation of this directive and its accompanying *Use of Funds Handbook*, the cardholder will be subject to the penalties and actions specified in the Institution's purchase card policy. This policy is currently promulgated in the *Purchase Card Training Manual*, dated May 2009. The policy will be incorporated into SD 322, *Charge Card Program*, when this directive is issued.

If it is discovered that a travel cardholder used the travel card inappropriately and in a manner that is a violation of this directive and its accompanying *Use of Funds Handbook*, the cardholder will be subject to the penalties and actions specified in the Institution's Travel Card policy. This policy is currently promulgated by CFO Bulletin #10-006, *Travel Card Program Management Oversight — Misuse and Abuse*, dated May 22, 2007. The policy will be incorporated into SD 322, *Charge Card Program*, when this SD is issued.

In addition to the above violations and penalties, individuals who do not comply with the policies and procedures proscribed in this directive and its accompanying *Use of Funds Handbook* may be personally responsible for expenses they incur, if the use of funds is found to be unauthorized.

Responsibilities

The **Secretary** is responsible for delegating responsibility for determining what constitutes a necessary expense to appropriate Smithsonian officials. Additionally, the Secretary has delegated responsibility to the Under Secretary for Finance and Administration/Chief Financial Officer for determining when expenditures have not complied with the necessary expense rule.

Responsibilities
(continued)

Direct reports to the Secretary and heads of museums, research centers, and offices are responsible for:

- determining what constitutes a necessary expense for their unit
- formally delegating responsibility to appropriate officials for ensuring that all commitments, obligations, and expenditures are in compliance with this directive, in accordance with procedures defined in SD 305, *Administrative Control of Funds*
- providing supplemental information on a questionable expense when requested by the CFO or the Director, OPMB
- ensuring that costs are assigned to an appropriate funding source at the time funds are first committed or obligated
- implementing procedures within their organizations to ensure compliance with this directive and the accompanying *Use of Funds Handbook*

The **Under Secretary for Finance and Administration/Chief Financial Officer** is responsible for:

- developing and maintaining the Smithsonian spending and use of funds policies
- conducting periodic audits or compliance reviews of expenses incurred by the Secretary and senior executives² and for reporting the results of these reviews to the Audit and Review Committee of the Board of Regents
- developing internal control and monitoring processes to ensure compliance with this directive

² Senior executives are those individuals defined as “disqualified persons” under the Internal Revenue Code, and those in Secretary-designated positions.

Responsibilities
(continued)

- investigating and evaluating all questionable expenses that have been identified to determine if expenses comply with the necessary expense rule
- working with appropriate senior Smithsonian Institution officials to propose and decide on employee disciplinary and adverse actions that may be required as a result of noncompliance with Smithsonian spending policies

The **Comptroller** is responsible for notifying the Director, OPMB, when an inappropriate use of SI funds is suspected or identified during routine processing of requests for reimbursement and vouchers.

The **Director, Office of Contracting and Personal Property Management (OCon&PPM)**, is responsible for notifying the Director, OPMB, when an inappropriate use of SI funds is suspected or identified during routine processing and reviews of purchase card charges, travel card charges, unit requisitions, purchase orders, or contracts.

The **Director, Office of Planning, Management and Budget (OPMB)**, is responsible for:

- maintaining this directive as well as the *Smithsonian Institution Use of Funds Handbook*
- serving as the primary source for real-time advice and guidance on what are appropriate and/or inappropriate uses of Smithsonian funds
- investigating and evaluating questionable expenses to determine if expenses comply with the necessary expense rule; for coordinating these assessments with key stakeholders; and for forwarding recommendations to the CFO for further action, when warranted
- conducting training workshops for Smithsonian staff to ensure adequate and comprehensive dissemination of SI spending policies

Responsibilities
(continued)

The **Inspector General**, in addition to the responsibilities as a head of a Smithsonian office, is also responsible for supporting the Board of Regents' Audit and Review Committee in fulfilling its duties for annually reviewing the travel, representational, and special event expenses incurred by or on behalf of the Secretary.

Individuals with delegated responsibility to commit, obligate, and expend SI funds are responsible for:

- maintaining and retaining official financial records in accordance with the Institution's records disposition schedule
- assigning costs to the correct funding source at the time of the commitment and/or obligation
- ensuring that all requisitions and purchase orders comply with this directive

Travel and Purchase cardholders and their approving officials are responsible for ensuring that all charges made on these cards are in compliance with this directive.

Records Retention

All obligating documents (requisitions, purchase orders, purchase card invoices, travel authorizations, etc.); supporting documentation (written approvals, email records, entertainment records, official representation documents, etc.); and vouchers are to be treated as official financial records, and appropriately filed (in writing or electronically) and retained in accordance with SD 501, *Archives and Records of the Smithsonian Institution*, and SD 505, *Smithsonian Institution General Records Disposition Handbook*.

Financial record retention periods vary from two years to six years and three months. Questions on financial document retention should be forwarded to the Office of the Comptroller.

Smithsonian Directive 323,
01/25/10

CANCELLATION:

Upon issuance of the *Smithsonian Institution Use of Funds Handbook*:

- Revision 2, "Interim Clarification of the Institution's Gift, Alcoholic Beverages and Food (GAF) and Related Expenses Policy," July 25, 2008;
- Smithsonian email dated September 25, 2008, Greeting Card Policy;
- Revision 1 to the March 28, 2007 "Interim Clarification of the Institution's GAF Policy," dated February 5, 2008;
- "Interim Clarification of the Institution's Gift, Alcoholic Beverages and Food (GAF) Policy," March 28, 2007; and "Use of Trust Funds for Representational and Special Event Expenses," dated December 1, 2004.

INQUIRIES:

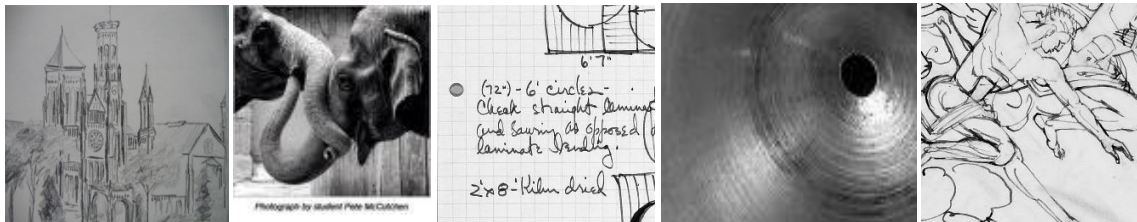
Office of Planning, Management and Budget (OPMB)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue.

Smithsonian Institution Use of Funds Handbook

Spending Policy for Federal and Trust Funds



Courtesy of Smithsonian Institution Collections Center



Table of Contents

Smithsonian Institution Use of Funds Handbook	4
Introduction	5
Section 1 Use of Funds by Activity.....	6
1.1. Statutory Boards & Committees, Advisory Boards, and Board Support...7	
1.2 Development.....	9
1.3 Official Representation	11
1.4 Business Activities	13
1.5 Special Events	15
Section 2 Use of Funds by Expense Type	17
2.1 Alcoholic Beverages	18
2.2 Awards (Non-Monetary) For Employees.....	19
2.3 Business Cards.....	24
2.4 Clothing & Protective Wear for Employees	27
2.5 Clothing & Protective Wear for Non-Employees	29
2.6 Emergency Operations	31
2.7 Food for Employees.....	35
2.8 Food for Individuals Other Than Employees.....	45
2.9 Gifts for Employees	50
2.10 Gifts for Others	52
2.11 Greeting Cards	57
2.12 Guests of the Smithsonian Institution	59
2.13 Historical Portraits	61
2.14 Honoraria.....	62
2.15 Kitchen Equipment/Supplies.....	65

2.16	Licensing Fees (Professional Licenses, Certifications, and Accreditations).....	68
2.17	Memberships (Fitness and Athletic Clubs – Including Purchase of Fitness Equipment).....	70
2.18	Memberships (Professional Associations).....	72
2.19	Memberships (Social Clubs).....	75
2.20	Personal Protective Items (Electrolyte Replacement Fluids, Sunscreen, Insect Repellents, Hand Sanitizers, etc.).....	76
2.21	Traffic Tickets and Parking Fines	79
2.22	Waiver of Policy.....	80
Section 3	Appendices	81
3.1	Appendix for GSA Food.....	82
3.2	Appendix for Special Event Spending Guidelines.....	83

Smithsonian Institution Use of Funds Handbook

The *Smithsonian Institution (SI) Use of Funds Handbook* implements *Smithsonian Directive (SD) 323 Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds*.

All Smithsonian funds are to be spent in accordance with principles, policies, and applicable laws set forth in *SD 323*. This *Handbook* provides additional specific guidelines for Smithsonian employees to follow when committing, obligating, and expending Smithsonian federal and trust funds. The policies established in this *Handbook* are considered directive, and not voluntary. Like *SD 323*, the policies apply to all Smithsonian units, regardless of their organizational level or physical location of operations.

The guidelines and policies contained in this *Handbook* are not applicable to transportation and per diem expenses of employees in travel status. When an employee is on official travel orders, the employee will follow the Institution's travel policies with regard to use of Smithsonian funds for the employee's food, light refreshments, and other related expenses such as parking, tolls, laundry, etc.

This *Handbook* is not intended to address every type of expense or situation that will arise. In all cases, the principles, policies, and applicable laws described in *SD 323* apply. However, staff with questions about specific types of expenditures not covered in this *Handbook* should consult his/her supervisor, administrative officer, or call OPMB.

To access a series of online training lessons about the use of Smithsonian funds, users with access to the Prism website may click [here](#).

The Office of Planning, Management and Budget (OPMB) is responsible for keeping the *Handbook* updated. The *Handbook* will be updated as required, and likely more frequently than the Directive.

Introduction

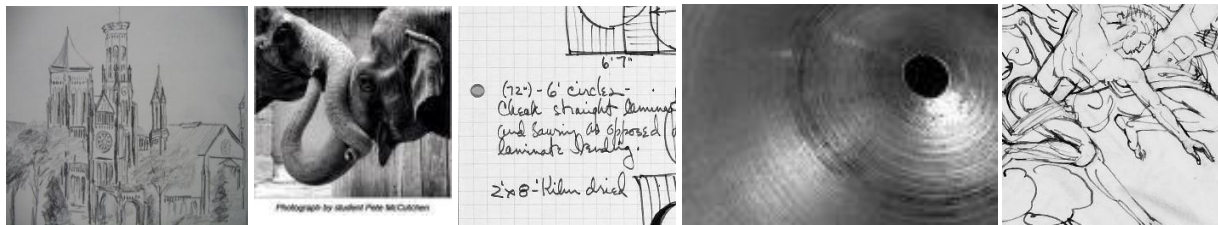
As stated in the background section of *Smithsonian Directive (SD) 323*, one of the Smithsonian's guiding principles – *Our Operations and Activities will Reflect our Status as a Public Trust Administered on Behalf of the American People* – forms the foundation upon which the Institution's spending policy was built. All funds available to the Institution, regardless of their source, are dedicated to public purposes, and each of us is responsible for the proper management and stewardship of these funds. Therefore, each use of Smithsonian funds must meet the "necessary expense rule".

To be considered a necessary expense of the Smithsonian, each expenditure must meet both of the following criteria:

1. The expenditure furthers the Smithsonian mission.
2. The expenditure is an allowable expense.
 - a. A federal expense is allowable when it is reasonably related to the purpose that Congress intended the appropriation to fulfill, not prohibited by law, and not within the scope of another appropriation.
 - b. A Smithsonian trust expense is allowable when at least one of the following conditions is met:
 - (1) Federal funds can be used for the same purpose
 - (2) The expense represents an ordinary cost commonly incurred by nonprofit organizations with missions similar to the Smithsonian
 - (3) For businesses operated by the Smithsonian, the expense represents an ordinary cost commonly incurred by that type of business activity in the commercial, federal or nonprofit sector

This *Handbook* provides guidance to Smithsonian employees on selecting the type of Smithsonian funds to be used for each type of expenditure. In some instances, either federal or trust funds can be used. In other instances, use of federal funds is prohibited. And in some instances, when donor restrictions limit how gift, grant or contract funds may be used, the use of trust funds may be prohibited.

Section 1 Use of Funds by Activity



Courtesy of Smithsonian Institution Collections Center

1. Use of Funds by Activity

1.1. *Statutory Boards & Committees, Advisory Boards, and Board Support*

- 1.1.1 Many Smithsonian museums, offices and research centers have one or more boards, in addition to the Smithsonian Board of Regents, that advise their Directors on various aspects of a Unit's programs and operations.
- 1.1.2 When a board has been statutorily established by Congress, federal appropriations may be used to fund board activities in accordance with the explicit authorities authorized by Congress. If not explicitly authorized, board-related expenses will need to be funded with trust funds. The boards that are statutorily established are listed below, along with the types of expenses for which federal funds are authorized to be used.
 - 1.1.2.1 Smithsonian Board of Regents: For necessary travel and other actual expenses to attend meetings of the Board.
 - 1.1.2.2 Board of Trustees of the National Museum of the American Indian: Per diem, travel, and transportation expenses for each day (including travel time) during which the trustees are engaged in the performance of duties of the Board, while away from their homes or regular places of business and at the place where the duties are performed. [Note: Federal funds may not be used for expenses for trustees who are not "on travel."]
 - 1.1.2.3 Native American Repatriation Review Committee: Travel, per diem, and other necessary expenses incurred in the performance of their duties as members of the Board.
 - 1.1.2.4 National Museum of African Art Board: Travel, per diem, and other necessary expenses incurred in the performance of their duties as members of the Board.
 - 1.1.2.5 National Air and Space Museum Advisory Board: Travel, per diem, and other necessary expenses incurred in the performance of their duties as members of the Board.
 - 1.1.2.6 National Museum of African American History and Culture Council: Per diem, travel, and transportation expenses for each day (including travel time) during which Council members are engaged in the performance of their duties of

the Council, while away from their homes or regular places of business and at the place where the duties are performed. [Note: Federal funds may not be used for expenses for Council members who are not “on travel.”]

- 1.1.3 Some statutorily established boards have enabling legislation and bylaws that do not expressly state when, and for what purpose, federal funds may be used. In these cases, board-related expenses will be funded with trust funds. These advisory boards are:
 - 1.1.3.1 Trustees of the Joseph H. Hirshhorn Museum and Sculpture Garden
 - 1.1.3.2 National Portrait Gallery Commission
- 1.1.4 Trust funds must be used to fund business-related board expenses for all other advisory boards not listed in *Section 1.1.2* above.
- 1.1.5 In the absence of legislation specifically authorizing direct reimbursement of certain travel expenses for board members, board member travel costs will be funded or reimbursed in accordance with Smithsonian travel policies and procedures.
- 1.1.6 Smithsonian funds may be used to purchase food (meals and light refreshments) and alcoholic beverages for board members when food and drink are an integral part of an official activity.
- 1.1.7 Only trust funds may be used for the following types of expenses in connection with boards:
 - 1.1.7.1 The purchase of gifts or mementos to formally thank a board member at the end of his/her board service
 - 1.1.7.2 The purchase of small gifts or greeting cards to recognize a board member's business events (i.e., a promotion), life events, and holidays.
 - 1.1.7.2.1 For this handbook, life events are defined as major events that change a person's status or circumstance, such as giving birth, marriage, divorce, or death of a spouse. Events that constitute significant turning points in a person's life also meet the Smithsonian definition of life events, such as birthdays, anniversaries, hospitalization, or serious illness.
- 1.1.8 When hosting a local board activity or event, a Unit Director, member of the Secretary's Cabinet, and the Secretary are authorized to invite one or more personal guests to participate in the event or activity, and the use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.

- 1.1.9 With advance written approval, an employee working for the Unit hosting a local board activity or event is authorized to invite one or more personal guests to participate in the event. The use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
 - 1.1.9.1 The Unit Director is the approving official for guests invited by employees assigned to his/her unit.
 - 1.1.9.2 A separate Use of Funds approval is not required when the employee's guest is otherwise included in a Smithsonian-funded Special Event approval document.
- 1.1.10 Only Smithsonian trust funds may be used to purchase meals or light refreshments for personal guests. The participation of a guest at a local board activity is considered more likely to be a "necessary expense" when:
 - 1.1.10.1 The individual has a role in the activity, such as host or hostess at a dinner in his/her home
 - 1.1.10.2 The guest's presence is dictated by tradition or protocol. For example, an employee's spouse may be included in a Smithsonian local board activity when spouses of invitees are expected to attend.
- 1.1.11 For purposes of this *Handbook*, a personal guest of the employee may include (but is not limited to): his/her spouse, domestic partner, parent, child, family member, business colleague, or friend.

1.2 Development

- 1.2.1 Development is the activity associated with efforts that engage individuals, corporations, and foundations in a philanthropic relationship with an organization. Development activities are an essential part of non-profit organizations and are the basis for establishing longstanding relationships with benefactors and non-government sponsors and grantors. To be designated a donor activity, at least one donor or prospective donor must be present.
- 1.2.2 For the purpose of this *Handbook*, a donor is an individual, corporation or organization engaged in a philanthropic relationship with the Smithsonian.
- 1.2.3 Employee participation in development activities and the type, amount and cost of food, light refreshments or beverages (including alcoholic beverages) will be reasonable, appropriate, and consistent with the Institution's development practices and associated special events guidelines.

- 1.2.3.1 Please refer to *Food for Individuals Other Than Employees*, page 45 for additional guidance.
- 1.2.4 In the absence of legislation authorizing the use of federal appropriations for development and fundraising activities, only trust funds may be used to pay for development activities.
 - 1.2.4.1 Expenses should be financed with unrestricted trust funds or with other trust funds if the conditions of a gift, grant or contract allow for the purchase of these items.
- 1.2.5 When hosting a development activity or event, a Unit Director, member of the Secretary's Cabinet, and the Secretary are authorized to invite one or more personal guests to participate in the event or activity, and the use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
- 1.2.6 With advance written approval, an employee working for the Unit hosting an event or activity is authorized to invite one or more personal guests to participate in the event. The use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
 - 1.2.6.1 The Unit Director is the approving official for guests invited by employees assigned to his/her unit.
 - 1.2.6.2 A separate Use of Funds approval is not required when the employee's guest is otherwise included in a Smithsonian-funded Special Event approval document.
- 1.2.7 Only Smithsonian trust funds may be used to purchase meals or light refreshments for personal guests.
- 1.2.8 The participation of a guest is considered more likely to be a "necessary expense" when:
 - 1.2.8.1 The individual has a role in the development activity, such as the host or hostess at a dinner in his/her home
 - 1.2.8.2 The guest's presence is dictated by tradition or protocol. For example, an employee's spouse may be included in a Smithsonian activity when spouses of donors are expected to attend.
- 1.2.9 For purposes of this *Handbook*, a personal guest of the employee may include (but is not limited to): his/her spouse, domestic partner, parent, child, family member, business colleague, or friend.

1.3 Official Representation

- 1.3.1 Official representation of the Smithsonian is an activity or event that is characterized by a mixed ceremonial, social and business purpose, and is formally hosted by a Smithsonian employee. Official representational activities are those required to fulfill etiquette and social responsibilities directly associated with the standing and prestige of the Smithsonian Institution. To be considered an official representation activity, the presence of at least one non-Smithsonian employee is required.
- 1.3.2 Examples of official representation activities or events include:
 - 1.3.2.1 A Museum Director hosts a lunch for his/her counterpart from another U.S. or international museum
 - 1.3.2.2 Special tours of new exhibits, including light refreshments, for congressional members and their families, hosted by a senior Smithsonian official
 - 1.3.2.3 Exchange of gifts (or hosting of meals) between the Smithsonian and a foreign government or other foreign organization that is hosting Smithsonian research or public programming in its country
 - 1.3.2.4 The Secretary and the Folklife Festival curator hosting a dinner for the Ambassador and other foreign dignitaries of a Festival participant country
 - 1.3.2.5 A Smithsonian astrophysicist invites a researcher to lunch at a local restaurant to discuss a research proposal the two organizations are preparing.
 - 1.3.2.6 A Smithsonian Director invites a potential future job applicant to lunch at a local restaurant to promote interest in upcoming employment opportunities at the Institution.
- 1.3.3 Reimbursement for staff meals is authorized up to the meal component of the GSA per diem rate, as detailed in the [GSA per diem schedules](#) for meals. (Please see *Food For Employees*, page 35 and following, for further information.)
- 1.3.4 For the purpose of this *Handbook*, official representation activities do not include the Smithsonian activities that are separately addressed in this *Handbook*:
 - 1.3.4.1 Statutory Boards & Committees, Advisory Board, and Board Support (Sec 1.1)
 - 1.3.4.2 Development and Fund Raising (Sec 1.2)
 - 1.3.4.3 Business activities (Sec 1.4)

1.3.4.4 Special events (Sec 1.5)

- 1.3.5 The Smithsonian does not have statutory authority to use federal funds for any form of official representation. Therefore, the Institution's policy is to use unrestricted trust funds for this purpose, unless the conditions of gift funds, grants, or contracts also permit this type of expenditure.
- 1.3.6 Official representation does not include meetings with any congressional government official for the purpose of influencing the official. The statute that is commonly referred to as the [Anti-Lobbying Act](#) (18 U.S.C. § 1913) prohibits any use of federal funds to pay for any item or device that is intended to seek favor, adoption, or opposition to any legislation or appropriation. In addition, because the Smithsonian is a tax-exempt. 501(c)(3) organization, the use of trust funds for lobbying activities is limited statutorily. Please see *SD 300, Use of Funds for Lobbying Purposes*, for further information about the use of trust funds when dealing with government officials.
- 1.3.7 As part of an official representation activity, a Unit Director, member of the Secretary's Cabinet, and the Secretary are authorized to invite one or more guests to participate in the official representation, and the use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
- 1.3.8 With advance written approval, an employee (other than the individuals listed in 1.3.6 above) conducting official representation activities is authorized to invite one or more guests to participate in the activity or event. The use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
- 1.3.8.1 The Unit Director is the approving official for guests invited by employees assigned to his/her unit.
- 1.3.9 When official representation gifts are given to foreign individuals, the Institution must use trust funds because it has no authority to use federal appropriations for this purpose. The Institution has elected to use the spending limits established by Section 515(b) of Public Law 95-105 for gifts for foreign individuals.
- 1.3.9.1 The spending limit is set by the General Services Administration. For fiscal year 2011, the limit is \$335 for a gift given as a souvenir or mark of courtesy.
- 1.3.9.2 Any gifts with a value greater than \$335 given by the Smithsonian to a foreign individual are to be reported to the Department of State, including those gifts purchased with trust funds.

- 1.3.9.3 The Office of Special Events and Protocol is responsible for the annual report to the Department of State.

1.4 Business Activities

- 1.4.1 Business activities are commercial activities that are operated or performed by Smithsonian units to generate unrestricted trust funds in excess of the costs of the activity (net gains). These net gains are always used to finance other Smithsonian mission requirements.
- 1.4.2 The Institution's policy is that funds generated by the business activity are available to finance the standard and customary costs required to carry out the business, provided that the expenses are directly related to or associated with operating the business activity.
- 1.4.3 Business expenses represent the cost of carrying on a trade or business. Necessary costs of the business are authorized to be incurred in connection with Smithsonian business activities, such as the costs of goods sold, capital investments, improvements, production costs, marketing, customer cultivation, operating expenses, and other costs commonly accepted for the particular field of business.
- 1.4.4 Entertaining clients and customers is a distinct type of business activity expense. Client and customer entertainment is considered an authorized business expense when all three of the following criteria are met:
- 1.4.4.1 The entertainment activity or event has the potential to result in increased net gains or increased mission advancement of the Smithsonian
- 1.4.4.2 The entertainment expenses are ordinary and necessary for the type of business activity
- 1.4.4.3 The expense is incurred in connection with an activity or event considered by the Institution to be appropriate.
- 1.4.5 When entertaining clients or customers, the following forms of business events and activities are considered appropriate for the expenditure of Smithsonian funds, provided that the event or activity and the venue in which the activity is occurring are nondiscriminatory (please refer to [*SD 200, Nondiscrimination in Events that Involve Smithsonian Employees*](#)). Expenses related to activities that are not specifically listed below, but that are consistent with the general policies and guidelines set forth herein, as well as [*IRS Publication 463, Section 2 \(Entertainment\)*](#), are also considered appropriate:
- 1.4.5.1 Meals, light refreshments, snacks and alcoholic beverages

- 1.4.5.2 Social, cultural, or leisure events including attendance at theaters/concerts; and spectator sports (baseball, football, golf tournaments); participatory activities (golf, tennis, etc.); and service-establishment activities (such as athletic clubs)
- 1.4.5.3 Receptions, celebratory and other events for the purpose of professional networking
- 1.4.5.4 Providing non-cash gifts to clients in accordance with guidelines provided in *Section 2.8 of the Handbook, Gifts for Others, page 52.*
- 1.4.6 For Smithsonian business activities that rely on generating advertising revenue, funds generated by the business may be used as follows:
 - 1.4.6.1 To make cash donations to charities, up to a value of \$250, through an advertising agency (the donation to the charity will be made by the agency, having been funded by the Smithsonian), provided that:
 - 1.4.6.1.1 The donation is for a non-profit organization that is not affiliated with a religious or political group
 - 1.4.6.1.2 The donation constitutes “added value” or an enhancement to the package offered to Smithsonian advertisers
 - 1.4.6.1.3 The proposed charitable donation is approved in writing in advance, as follows:
 - 1.4.6.1.3.1 Charitable donations up to \$250 must be approved by the Smithsonian Chief Financial Officer
 - 1.4.6.1.3.2 Charitable donations in excess of \$250 will be approved by the Secretary
 - 1.4.6.2 For transportation and lodging of advertising clients and agency personnel (and their invited guests) and Smithsonian advertising sales representatives (employees or contractors) when the travel and associated costs are related to attending:
 - 1.4.6.2.1 Sales or business meetings directly related to Smithsonian lines of business
 - 1.4.6.2.2 Marketing events and programs organized by the Smithsonian as a current or prospective sponsor
 - 1.4.6.2.3 Industry-related events or awards ceremonies involving clients, advertising agencies, or advertising sales representatives

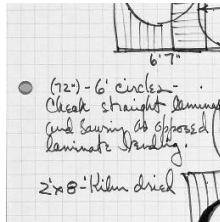
- 1.4.7 When hosting a business activity or event, a Unit Director, member of the Secretary's Cabinet, and the Secretary are authorized to invite one or more personal guests to participate in the event or activity, and the use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
- 1.4.8 With advance written approval, an employee working for the Unit hosting a business activity or event is authorized to invite one or more personal guests to participate in the event. The use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense.
 - 1.4.8.1 The Unit Director is the approving official for guests invited by employees assigned to his/her unit.
 - 1.4.8.2 A separate Use of Funds approval is not required when the employee's guest is otherwise included in a Smithsonian-funded Special Event approval document.
- 1.4.9 Only Smithsonian trust funds may be used to purchase meals or light refreshments for personal guests.
- 1.4.10 The participation of a guest is considered more likely to be a "necessary expense" when:
 - 1.4.10.1 The individual has a role in the activity, such as the host or hostess at a dinner in his/her home
 - 1.4.10.2 The guest's presence is dictated by tradition or protocol. For example, an employee's spouse may be included in a Smithsonian activity when spouses of invitees are expected to attend.
- 1.4.11 For purposes of this *Handbook*, a personal guest of the employee may include (but is not limited to): his/her spouse, domestic partner, parent, child, family member, business colleague, or friend.
 - 1.4.11.1 The participation of these individuals has been approved in writing by the President SE for SE activities, or by the applicable Under Secretary or the Director of Communications and External Affairs for all other Smithsonian business activities

1.5 Special Events

- 1.5.1 Special events include a variety of activities, such as meetings, conferences, film screenings, lectures, seminars, symposia, artist performances, exhibition receptions, cocktail receptions, seated and buffet dinners, luncheons, public programs, private staff events (such as scholarly lectures), and other related activities.

- 1.5.2 Whenever Smithsonian federal or trust funds are used to finance special events, Smithsonian staff shall comply with policies, procedures, and guidelines as established by the Institution's Special Event Guidelines that will become an Appendix to SD 401, *Use of Facilities for Special Events and Public Programs*.
- 1.5.2.1 For ease of reference, the *Special Event Guidelines* are provided as an *Appendix* to this *Handbook* on page 83 until this *Appendix* is incorporated into [SD 401](#).
- 1.5.2.2 It is the responsibility of the event host, the special event coordinator, the reviewing official, and the authorizing official to ensure that the event elements reflect the appropriate event category, and that expenses related to these events are justifiable, reasonable and not lavish within the context of the event.
- 1.5.2.3 Expenses for all Smithsonian special events, including those hosted for and by the Regents, must constitute a necessary expense, and be in support of the Smithsonian mission and not for personal benefit.
- 1.5.2.4 In addition to complying with the *Special Event Guidelines*, all special event expenses must also comply with the applicable provisions of [SD 323, Smithsonian Institution Spending Policy for Federal Appropriations and Trust Funds](#) and this *Use of Funds Handbook*.

Section 2 Use of Funds by Expense Type



2.1 Alcoholic Beverages

General Guidelines: SI funds may be used to purchase alcoholic beverages under certain conditions, defined below.

	Activity	SI Policy
A	Official Representation, Special Events, Development Activities, Board Activities, or Business Activities	1. Smithsonian funds may be used to purchase alcoholic beverages when these beverages are a necessary component of a Smithsonian special event, fundraising activity, business activity, museum/advisory board activity, or other official representation.
		<u>Funding Sources:</u> Trust funds are the only type of funds authorized to purchase alcoholic beverages for employees, unless federal funds are statutorily authorized for this use.
B	Employee-Only Events and Activities	1. No SI funds will be used to purchase alcohol for staff-only events, regardless of the purpose or the time of day. a. Staff-only events or activities are those events or activities which are staff-related and where attendees are primarily Smithsonian employees and volunteers. Examples of staff-only events are day-to-day staff meetings, training workshops, research collaboration meetings, and internal subject matter groups.
		<u>Funding Sources:</u> No SI funds are to be used for the purchase of alcoholic beverages for staff-only events.

2.2 Awards (Non-Monetary) For Employees

General Guidelines: The Institution endeavors to honor employee achievements, and a number of SI-award programs have been established to recognize excellence in administration, scholarship, research, and technology. Unit Directors may also establish Unit-specific programs to recognize their employee achievements.

Smithsonian funds can be used to purchase non-monetary awards to recognize or honor employees or groups of employees when these awards are made in accordance with the Institution's personnel policies, promulgated by [Chapter 451 \(Awards and Honors\) of SD 212 \(Federal Personnel Handbook\)](#) and [SD 213 \(Trust Personnel Handbook\)](#).

The Institution must also comply with regulations laid out in the [Employer's Tax Guide to Fringe Benefits \(Publication 15B\)](#) when using SI funds to purchase non-monetary awards. IRS regulations require employees to pay taxes on all awards received, including non-monetary awards, except for:

- Length of service awards,
- Safety achievement awards, and
- Other Awards that are of nominal value and awarded infrequently and not regularly

The Institution's policy is that Units will provide to employees only non-monetary awards that are not taxable. In order to comply with IRS regulations related to non-monetary awards, the Smithsonian Community Committee has been asked to lead an effort to develop a Non-Monetary Honorary Awards Catalog. This Catalog will contain items that meet the IRS rules for nominal value, and also provide suggestions for appropriate length of service and safety achievement awards. Once issued, Units will be expected to select non-monetary awards from this Catalog.

	2.2 Awards (Non-Monetary) for Employees	SI Policy
A	Non-Monetary Honorary Award (General)	<ol style="list-style-type: none"> 1. Non-monetary Honorary Awards are given to employees, or a group of employees, to recognize continued services or a one-time special act associated with their employment that contributed to the efficiency, economy or improvement of SI operations. Non-monetary awards may be given alone or in conjunction with monetary awards. 2. SI funds may be used to purchase non-monetary awards as authorized by SD 212 and SD 213. 3. SI funds may also be used to purchase non-monetary awards not described in <i>SDs 212</i> and <i>213</i> when the Unit has a written honorary awards program in place that has been endorsed or approved by the Office of Human Resources (OHR): <ol style="list-style-type: none"> a. The Unit awards program documentation submitted to OHR should describe the purpose of the award, the nomination process, the decision-making process, and the types of recognition to be conferred. 4. To be considered a non-monetary honorary award, all of the criteria listed below must be met: <ol style="list-style-type: none"> a. The item must be something that the recipient could reasonably be expected to value, but not something that conveys a sense of monetary value b. The item must have “lasting trophy value” c. The item must clearly symbolize the employer-employee relationship in some fashion d. The item must take an appropriate form to be used in the public sector, in keeping with our status as a public trust, and must be purchased with public funds e. The item must be of nominal value, consistent with the circumstances, and not lavish. 5. The following types of non-monetary honorary awards can be purchased using SI funds, when appropriate for the specific type of award: <ol style="list-style-type: none"> a. Certificates, plaques and medals

	2.2 Awards (Non-Monetary) for Employees	SI Policy
A	Non-Monetary Honorary Awards (General) continued	<ul style="list-style-type: none"> b. Framed Smithsonian posters/pictures c. Tangible objects such as, but not limited to, pen/pencil set, briefcase, watch, desk clock, and items from Smithsonian museum shops or online stores d. Items bearing the Smithsonian or Unit name, or items onto which an SI logo or other insignia has been affixed (e.g. paperweight, article of clothing, tote, mug, etc.) e. Items selected from the Smithsonian Non-Monetary Awards Catalog <p>6. SI funds may not be used to purchase the following types of non-monetary honorary awards:</p> <ul style="list-style-type: none"> a. Gift certificates or gift cards, because these convey monetary value and do not symbolize the employer-employee relationship b. Items such as food or beverage certificates and vouchers or tickets to events, because these are intended to be redeemed for something that has no lasting value c. Gift items that are not symbolic of the employee's relationship with the Smithsonian Institution <p>7. Honorary non-monetary awards are often presented at employee recognition ceremonies. Smithsonian funds can be used to purchase food and light refreshments for receptions incident to SI-wide and Unit-conducted award and employee recognition ceremonies. Please refer to <i>Section 2.7: Food for Employees, page 35</i> for detailed guidance.</p>

	2.2 Awards (Non-Monetary) for Employees	SI Policy
B	Length of Service (Career Service) Recognition Awards	<ol style="list-style-type: none"> 1. Length of service (or career service) may be recognized with informal recognition items or, when the employee is being recognized for consistent exemplary performance during their career, with cash or time-off awards. 2. The Institution's personnel policies (SD 212 and SD 213) authorize the issuance of career service emblems or pins to employees who complete 10 years or more service (in federal and/or trust appointments) to the Institution. <ol style="list-style-type: none"> a. The purchase of these pins/emblems constitutes a necessary expense and SI funds are authorized to purchase these items. 3. At the Unit Director's discretion, other cost-equivalent honorary awards may be purchased and provided to employees in lieu of emblems or pins to recognize career service achievements. <ol style="list-style-type: none"> a. To ensure the length of service award is not subject to IRS taxes: <ol style="list-style-type: none"> i. The value of the length of service and safety achievement awards, combined, may not exceed the limits established by the IRS for employee achievement awards ii. The award must comply with the criteria defined in <i>Section 2.2.A</i> above. b. Alternatively, the award may be selected from the Smithsonian Non-Monetary Honorary Awards Catalog. Note: This Catalog is not yet published, but will be forthcoming.
C	Safety Achievement Awards	<ol style="list-style-type: none"> 1. Units are authorized to use SI funds to purchase non-monetary safety achievement awards when the Unit Director has approved a safety award program, and OHR has endorsed this program. 2. To ensure the award is not subject to IRS taxes, the value of any length of service and safety achievement awards, combined, may not exceed the limits established by the IRS for employee achievement awards.

	2.2 Awards (Non-Monetary) for Employees	SI Policy
D	Other Non-Monetary Awards (Nominal Value)	<p>1. Units are authorized to use SI funds to purchase non-monetary awards (other than length of service and safety achievement) only when both of the conditions below are met:</p> <ul style="list-style-type: none"> a. The award meets the criteria defined in <i>Section 2.2.A</i>. b. After the Smithsonian Community Committee publishes the Non-Monetary Awards Catalog, all “other non-monetary” awards must be selected from this catalog. <p>2. Until the Catalog is issued, the value of non-monetary awards of nominal value (not including awards for length of service or safety) must be below \$50 and may not be cash-equivalents (i.e., gift certificates, gift cards), in order to comply with the IRS criteria. Such awards of nominal value are given infrequently and not regularly.</p> <p><u>Funding Sources:</u> The <i>Government Employees Incentive Awards Act</i> (5 USC §§ 4501-4506) authorizes the use of federal funds to purchase all types of non-monetary awards for federal employees. The cost of non-monetary awards for trust employees should be funded with trust funds.</p>

2.3 Business Cards

General Guidelines: Smithsonian business cards are a professional means of identification used by employees and other qualified individuals to help expedite communication and promote the Smithsonian Institution.

SI funds may be used to purchase SI business cards for qualified individuals whose regular duties and responsibilities require ongoing or future contact with external organizations and people. Examples of qualified individuals include: employees, board members, committee members, contractors, Fellows, volunteers, and research associates.

Directors of Smithsonian units, or their designees, must determine if a request for SI business cards is appropriate, and, if so, approve the purchase. Business cards may be necessary when the individual has regular duties and responsibilities that require ongoing contact with the following:

- Officials and representatives from outside institutions, agencies, or companies
- Organizations and individuals with which future contact is necessary (such as contractors), or desirable (such as potential donors)

	Activity	SI Policy
A	Business Cards for Employees	<ol style="list-style-type: none"> 1. Unit directors, or their designees, approve the purchase of SI business cards for qualified Smithsonian employees. 2. Smithsonian business cards shall identify the cardholder's name, contact information, assigned position, and the SI unit represented. 3. Business card purchases are initiated and administered in accordance with the SI simplified acquisition policies and procedures set forth in the SD 314, <i>Contracting</i>, and the accompanying parts of the <i>Procurement and Contracting Procedure Manuals</i> (PCPMs). 4. The Office of Contracting and Personal Property Management (OCon&PPM) has negotiated blanket purchase agreements (BPAs) with vendors for business cards and other printing. The listing is included in OCON 9, <i>Blanket Purchase Agreements</i>, and is available on Prism (OCon&PPM Forms and References) under Procurement Information. 5. SI business cards shall be produced by following the business card specifications cited and illustrated on the

	Activity	SI Policy
A	Business Cards for Employees (continued)	<p>Smithsonian Visual Identity Program website (www.logo.si.edu) and as outlined in SD 104, Smithsonian Visual Identity Program.</p> <p><u>Funding Sources:</u> Purchases of business cards — for federal employees only — may be paid from the available balance of federal funds allocated to the unit.</p> <p>Purchases of business cards — for federal or trust employees — may be paid from the available balance of unrestricted trust funds allocated to the unit.</p> <p>Availability of funds must be verified and requests for SI business cards must be approved prior to purchases.</p>
B	Business Cards for Individuals Other Than Employees	<ol style="list-style-type: none"> 1. Unit directors, or their designees, approve the purchase of SI business cards for qualified individuals. Examples include board members, committee members, contractors, Fellows, volunteers, and research associates. 2. Smithsonian business cards shall indicate the individual's name, contact information, SI unit with which the individual is associated, and an accurate description of the affiliation with the Smithsonian. Non-employee status shall be indicated clearly on SI business cards issued to individuals (for example, Board Member, Contracted Curatorial Representative, etc.). 3. Business card purchases are initiated and administered according with the SI simplified acquisition policies and procedures set forth in SD 314, Contracting, and the accompanying parts of the PCPM. 4. OCon&PPM has negotiated BPAs with vendors for business cards and other printing. The listing is included in OCON 9, Blanket Purchase Agreements, and is available on Prism (OCon&PPM Forms and References) under Procurement Information. 5. SI business cards shall be produced by following the business card specifications cited and illustrated on the Smithsonian Visual Identity Program website (http://logo.si.edu/) and as outlined in SD 104, Smithsonian Visual Identity Program.

	Activity	SI Policy
B	Business Cards for Individuals Other Than Employees (continued)	<u>Funding Sources:</u> Purchases of business cards — for individuals other than employees — may be paid from the available balance of unrestricted trust funds allocated to the unit. Availability of funds must be verified and requests for SI business cards must be approved prior to purchases.

2.4 Clothing & Protective Wear for Employees

General Guidelines: Smithsonian federal and trust funds can be used to purchase wearing apparel and clothing for Smithsonian employees when special clothing or equipment is required for performance of assigned tasks.

	Type of Clothing/Apparel	SI Policy
A	Uniforms	<ol style="list-style-type: none"> 1. A uniform is defined in the U.S. Code as an article of distinctive clothing or insignia, including a badge, emblem, or identification card, that is an indication of the authority of a public employee. (18 USC 716) 2. A Smithsonian Institution uniform is a specific article or articles of clothing that may include, but is not limited to, such items as shoes, boots, hats, shirts, t-shirts, vests, slacks, skirts, or outerwear an employee is required by the Institution to wear to provide a distinctive and easily identifiable appearance in performing his or her job. (5 CFR 591.102) <ol style="list-style-type: none"> a. For Office of Facilities Engineering and Operations (OFEO) staff, further guidance can be found in the OFEO Uniform Policy 3. Smithsonian funds are authorized to purchase uniforms for employees to wear during duty hours when a uniform is required. <p><u>Funding Sources:</u> When authorized by the annual federal appropriation, federal funds can be used to purchase, rent, repair and clean uniforms for federal employees. Otherwise, trust funds must be used for uniform and uniform-related costs for federal and trust staff.</p>
B	Protective Wear	<ol style="list-style-type: none"> 1. Protective wear and personal protective equipment (PPE) refers to protective clothing, helmets, goggles, or other garments designed to protect the wearer's body or clothing from injury by blunt impacts, electrical hazards, heat, chemicals, and infection, for job-related occupational safety and health purposes. PPE can also be used to protect the working environment from pesticide application, pollution or infection from the worker. PPE includes reusable water bottles when hydration is a health and safety factor. 2. SI funds are authorized to be used to purchase PPE for employees to protect employees from potential hazards of the jobs they perform.

	2.4 Clothing for Employees	SI Policy
B	Protective Wear (continued)	<p>3. Protective wear and PPE, including items such as prescription safety glasses and steel-toed shoes, remain the property of the Smithsonian (5 U.S.C. § 7903). Employees who are issued protective wear are required to properly wear, use, inspect, clean, maintain, and store the equipment.</p> <p><u>Funding Sources:</u> When protective wear is required to perform duties associated with federally-funded activities, federal funds can be used to purchase protective wear for any Smithsonian employee, intern, academic appointee, or docent, although trust funds are also available to be used. When the protective wear is required to perform duties for which federal funds are not authorized (such as operating museum concessions), only trust funds may be used for these purchases.</p>
C	Other Personal Protective Items	Please refer to <i>Section 2.20 Personal Protective Items</i> , page 76 for information on electrolyte replacement beverages (e.g., Gatorade), sunscreen, and hand sanitizers.
D	Apparel as Incentive or Non-Monetary Award	Please refer to the Awards (Non-Monetary) for Employees section of this <i>Handbook</i> for additional information, in <i>Sections 2.2.A and 2.2.B</i> on page 20.
E	Apparel in Connection with Morale & Welfare Activities	<p>1. When specifically approved, in writing and in advance, by the Secretary, the purchase of t-shirts or other articles of clothing for employees will be authorized in support of SI-wide morale and welfare activities.</p> <p>2. The purchase of t-shirts is approved for these two activities:</p> <ul style="list-style-type: none"> a. The annual Smithsonian Holiday Party b. Smithsonian Healthy and Active Program for Employees (SHAPE) activities. <p><u>Funding Sources:</u> Only Smithsonian trust funds are available to be used to purchase program apparel in support of Institution-wide morale and welfare initiatives.</p>

2.5 Clothing & Protective Wear for Non-Employees

General Guidelines: For purposes of this *Handbook*, individuals other than employees include volunteers, docents, and academic appointees. (Examples of academic appointees include interns, Fellows, and research associates.) Smithsonian federal and trust funds can be used to purchase wearing apparel and clothing for individuals other than Smithsonian employees when these individuals provide services to or are involved in Smithsonian activities that require special clothing or equipment.

	Type of Clothing/Apparel	SI Policy
A	Uniforms	<ol style="list-style-type: none"> 1. A uniform is a specific article or articles of clothing that may include, but is not limited to, such items as shoes, boots, hats, shirts, t-shirts, vests, slacks, skirts, or outerwear an individual is required by the Institution to wear so that this individual is readily identifiable to the public or Smithsonian employees. 2. Smithsonian funds are authorized to purchase uniforms for individuals other than Smithsonian when these individuals need to be easily identifiable to the public or Smithsonian employees.
		<p><u>Funding Sources:</u> Unless authorized by the annual federal appropriation, federal funds cannot be used to purchase, rent, repair and clean uniforms for individuals other than federal employees. Therefore, in most cases, trust funds must be used for uniform and uniform-related costs for volunteers, docents, and academic appointees.</p>
B	Protective Wear	<ol style="list-style-type: none"> 1. Protective wear and personal protective equipment (PPE) refers to protective clothing, helmets, goggles, or other garments designed to protect the wearer's body or clothing from injury by blunt impacts, electrical hazards, heat, chemicals, and infection, for job-related occupational safety and health purposes. PPE can also be used to protect the working environment from pesticide application, pollution or infection from the individual. PPE includes reusable water bottles when hydration is a health and safety factor. 2. SI funds are authorized to purchase PPE for volunteers, docents, and academic appointees when these individuals require protection from potential hazards of the activities they perform on Smithsonian premises.

	2.5 Clothing for Non-Employees	SI Policy
B	Protective Wear (continued)	Protective wear and PPE, including items such as prescription safety glasses and steel-toed shoes, remain the property of the Smithsonian. Volunteers and academic appointees (e.g., interns, Fellows, and research associates) who are issued protective wear are required to properly wear, use, inspect, clean, maintain, and store the equipment.
		<u>Funding Sources:</u> When protective wear is required to perform duties associated with federally-funded activities, federal funds can be used to purchase protective wear for any Smithsonian volunteer or academic appointee, although trust funds are also available to be used. When the protective wear is required to perform duties for which federal funds are not authorized (such as operating museum concessions), only trust funds may be used for these purchases.
C	Other Personal Protective Items	Please refer to <i>Section 2.20, Personal Protective Items, page 76</i> , for information on Gatorade and similar electrolyte replacement beverages, sunscreen, and hand sanitizers.

2.6 Emergency Operations

General Guidelines: Most emergency and disaster situations affecting Smithsonian facilities and organizations are handled routinely within the unit, or, as appropriate, by the Office of Facilities Engineering and Operations (OFEO) or local area emergency services. The *Smithsonian Disaster Management Program (SD 109)* recognizes that the Institution's operations can be affected by a wide range of emergencies and disasters and ensures that the Institution is prepared to respond to and recover from such events.

The Director of OFEO, or his/her delegated official, is the commander of the Emergency Operations Center (EOC) and is responsible for the declaration of an emergency or disaster and the activation of the EOC. In most emergency and disaster situations, this can be done informally through telephone and email communication. However, certain disasters or emergencies may require resources, including materials, finances, and human capital, beyond normal operating parameters in order to adequately respond to the disaster and safeguard Smithsonian staff, visitors, facilities, and collections.

Under these circumstances, and if the criteria set forth below exist, the Director, OFEO, or his/her designee, and the Director of the Office of Human Resources (OHR), or his/her designee, must formally declare, in writing, that this type of emergency or disaster has occurred. For the purpose of determining the appropriate use of Smithsonian funds for employee food or lodging, the incident is defined as a "crisis." In extreme situations, the President may also declare a crisis, authorizing certain expenses.

In order for a crisis to be declared, a situation must exist in which:

- a. OFEO identifies a disruption to normal business operations that cannot be managed by the local facility resources and necessitates the activation of the EOC
- AND
- b. the situation involves imminent danger to human or animal life (i.e., possibility of mass casualties), the destruction of SI property (buildings, property or collections), and/or extended disruption to SI operations and mission
- AND
- c. immediate action must be taken to respond to the situation and emergency response is expected to be required for an extended period of time.

Smithsonian funds may be used to purchase and provide food, lodging, and disaster supplies only for personnel designated as "emergency personnel" during the crisis, and only when these designated employees must remain at their duty station for longer than 16 consecutive hours. For the purpose of this *Handbook*, any Smithsonian employee involved in responding to the crisis on site, under the direction of a Smithsonian supervisor or manager, will be designated as "emergency personnel."

Conversely, some situations may be considered emergencies or disasters, but they do not constitute a crisis unless so declared.

During non-crisis emergencies and disasters, Smithsonian funds will not be used to purchase or provide food or beverages to employees; employees are expected to be prepared to provide their own food for the duration of their work assignment and to provide lodging and personal supplies from their personal salaries.

	2.6 Emergency Operations	SI Policy
A	Food for Employees During Emergency Operations	<ol style="list-style-type: none"> 1. As a general rule, and absent statutory authority, federal appropriations and trust funds are not available to purchase food for federal employees at their permanent duty station. Employees are expected to bear the cost of personal expenses, such as meals and light refreshments, from their own salaries. However, during a declared crisis, Smithsonian funds may be used to purchase food and beverages for emergency personnel when the purchase constitutes a necessary expense, and when each of the following conditions is met: <ol style="list-style-type: none"> a. The Institution has formally declared a crisis, in writing. b. The emergency personnel are required to remain at their duty station for longer than 16 consecutive hours. c. Food is not available to be purchased by the employee at or nearby the employee's duty station. What constitutes "nearby" may vary depending on the cause of the crisis (e.g., if the crisis is a severe blizzard during which it is dangerous to be outside for more than a short time, "nearby" may be a short walking distance; if the crisis is a fire at the Smithsonian, when travel is not unsafe, "nearby" may be a further distance away.) 2. No Smithsonian funds (federal or trust) will be used to purchase food for emergency personnel unless a crisis has been formally declared in writing. 3. No Smithsonian funds (federal or trust) will be used to purchase food for personnel who do not meet the definition of "emergency personnel."

	2.6 Emergency Operations	SI Policy
A	Food for Employees During Emergency Operations (continued)	4. Smithsonian funds <u>can</u> be used to supply water to emergency personnel during a situation that is an emergency but not a declared crisis. For detailed procedures about water supplies during emergencies, please refer to SD 414, SI Energy Management Program
		<u>Funding Sources:</u> During a declared crisis, federal or trust funds, or a combination thereof, may be used to purchase food and beverages for emergency personnel (employees who are on site providing crisis response).
B	Lodging for Employees During Emergency Operations	<p>1. As a general rule, and absent statutory authority, federal appropriations are not available to purchase hotel rooms for employees at their permanent duty station. Employees are expected to bear the cost of their housing from their own salaries unless they are in an official travel status. Please consult SD 312, Travel, for guidance on lodging during official travel.</p> <p>2. Federal funds are authorized to pay for lodging for emergency situations only when all of the following criteria are met:</p> <ul style="list-style-type: none"> a. The crisis is a Presidentially declared disaster b. The designated emergency employees are the only employees capable of doing the work c. Without provided lodging, it would be impossible to staff an emergency support team, due to a lack of <u>any</u> viable means of transportation to and from the duty station. <p>3. Trust funds may be used to pay for lodging when all the following criteria are met:</p> <ul style="list-style-type: none"> a. The Director of OFEO or higher authority declares a crisis. b. Transportation to and from the duty station is extremely hazardous or impossible, such that there is a significant risk that emergency personnel will not be available if travel from home is required. c. The unit director deems the purchase of hotel rooms for designated emergency staff a necessary expense.

	2.6 Emergency Operations	SI Policy
B	Lodging for Employees During Emergency Operations (continued)	<u>Funding Sources</u> : During a declared crisis situation, federal funds may be used for purchasing hotel rooms <u>only</u> when all criteria in 2) above are met. Trust funds may be used to purchase lodging when the criteria in 3) are met.
C	Supplies and Materials for Emergency Preparedness	<p>Unit directors are responsible for determining if purchasing supplies and materials to stockpile and have on hand to prepare for an emergency are necessary expenses. The unit director must determine if these expenses are essential to sustain the unit's mission during an emergency. Emergency preparedness materials for designated emergency personnel may include the following:</p> <ol style="list-style-type: none"> 1. Food such as: Meal, Ready-to-Eat (MRE), a self-contained, individual field ration for use in conditions where organized food facilities are not available. 2. Bottled water 3. Health and first-aid kits 4. Shelter/Warmth, such as blankets and cots 5. Signaling tools 6. Multi-purpose tools or materials <p>Please refer to SD 109 for detailed information about disaster preparedness and shelter-in-place guidance.</p> <p><u>Funding Sources</u>: Federal funds are authorized to purchase emergency preparedness supplies to equip federal employees who are designated as emergency personnel. Trust funds must be used to purchase emergency preparedness supplies to equip trust employees who are designated as emergency personnel. Alternatively, supplies and materials for emergency preparedness may be purchased entirely with trust funds.</p>

2.7 Food for Employees


General Guidelines: As a general rule, and absent statutory authority, federal appropriations are not available to purchase food for federal employees at their permanent duty station. Employees are expected to bear the cost of personal expenses, such as meals and light refreshments, from their own salaries. However, Smithsonian funds may be used to purchase food or drinks that will be consumed by employees, when the purchase constitutes a necessary expense, as set forth below.

When federal funds are not authorized and available, unrestricted trust funds are most commonly used to purchase food and light refreshments. Restricted trust funds are available for these purposes when the gift, grant, contract or endowment explicitly allows this use of donor/sponsor funds.

When an employee is on official travel status, these *Use of Funds* guidelines do not apply.

	Activity	SI Policy
A	Employee Awards & Recognition Ceremonies	<ol style="list-style-type: none"> 1. Smithsonian funds can be used to purchase light refreshments for receptions incident to SI-wide and Unit conducted award and employee recognition ceremonies. 2. Smithsonian funds can be used to purchase meals (breakfast, lunch and dinner) when at least one of the following conditions is met: <ol style="list-style-type: none"> a. The ceremony involves one of the SI incentive awards programs recognized in SD 212 or 213, or b. The Unit has a formal honorary awards program that has been approved by the Unit Director and the Office of Human Resources, and this program justifies the provision of meals to recognize employee performance and achievements for specific situations. 3. As a guide, the cost of meals should not exceed \$20 per person. (This limit was established by the Comptroller General and is documented in Comptroller General Decision B-270327.) The number and costs of these types of award recognition activities should be kept to a minimum, both as a matter of economy and as public evidence of the Institution's prudent use of resources.

	2.7 Food for Employees	SI Policy
A	Employee Awards & Recognition Ceremonies (continued)	<u>Funding Sources:</u> Federal funds can be used only when the person(s) being honored is a federal employee. Trust funds must be used when the person(s) being recognized is a trust employee. When both federal and trust employees are being recognized, the costs should be proportionally shared based on the number of employees being recognized. Trust funds can be used in lieu of federal funds no matter which type of employee is being recognized.
		<u>Special Note on Authorities:</u> The <i>Government Employees Incentive Awards Act</i> authorizes federal agencies to incur necessary expenses for the honorary recognition of employees to foster public recognition of employees' meritorious performance and to allow other employees to honor and congratulate their colleagues.
B	Meals with Colleagues (Official Representation Activities)	<ol style="list-style-type: none"> 1. Official representation is an activity or event that is characterized by a mixed ceremonial, social and business purpose, and is formally hosted by a Smithsonian employee. Official representational activities are those required to fulfill etiquette and social responsibilities directly associated with the standing and prestige of the Smithsonian Institution. To be considered an official representation activity, the presence of at least one non-Smithsonian employee is required. 2. Smithsonian funds are authorized to be used to reimburse staff for the cost of their meals during conduct of official representation activities, when the Unit Director deems the meal as a necessary expense in conducting the official representation. 3. The Institution has elected to use the <i>Meals and Incidental Expenses (M&IE) Breakdown</i> of the GSA per diem rates to set the maximum reimbursement amount for staff meals. The per diem rates can be found on the Prism website under Per Diem rates at SI Travel - TravelLinks. (Click on "Find Domestic and International Per Diem rates.")

	2.7 Food for Employees	SI Policy																						
B	Meals with Colleagues (Official Representation Activities) continued	<p>The current reimbursement rates for meals in Washington, DC; Boston; and New York, as of March, 2011, are:</p> <table><tr><td>Breakfast</td><td>\$ 12</td></tr><tr><td>Lunch</td><td>\$ 18</td></tr><tr><td>Dinner</td><td>\$ 36</td></tr></table> <p>4. Receipts for reimbursement must be annotated to identify the host(s)' costs, to be reimbursed up to the GSA limits. The remaining costs for guests, tax, and tip are fully reimbursed as intrinsic expenses of the Official Representation. An example of a properly annotated receipt is shown below. (Note that the costs for SI hosts are reimbursed up to \$18, the GSA limit for lunch in Washington, DC. Remaining costs are fully reimbursed.)</p> <div><table><tr><th colspan="2">Reimbursement for Official Representation</th></tr><tr><td>SI Host #1</td><td>\$18</td></tr><tr><td>SI Host #2</td><td>\$18</td></tr><tr><td>Guest #1</td><td>\$20</td></tr><tr><td>Guest #2</td><td>\$16</td></tr><tr><td>Tax</td><td>\$7</td></tr><tr><td>Tip</td><td>\$15</td></tr><tr><td>Total</td><td>\$94</td></tr></table></div> <p>5. If a receipt is not clearly annotated to identify the SI host(s)' costs, reimbursement for the event shall be denied.</p> <p>6. Please refer to the next section, <i>Food for Individuals Other than Employees</i>, page 45, for guidance about reimbursement for meals for non-employees during the conduct of official representation.</p> <p><u>Funding Source</u>: Only Smithsonian trust funds will be used to reimburse staff for the cost of their meals during the conduct of official representation.</p>	Breakfast	\$ 12	Lunch	\$ 18	Dinner	\$ 36	Reimbursement for Official Representation		SI Host #1	\$18	SI Host #2	\$18	Guest #1	\$20	Guest #2	\$16	Tax	\$7	Tip	\$15	Total	\$94
Breakfast	\$ 12																							
Lunch	\$ 18																							
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SI Host #2	\$18																							
Guest #1	\$20																							
Guest #2	\$16																							
Tax	\$7																							
Tip	\$15																							
Total	\$94																							

	2.7 Food for Employees	SI Policy
C	Training Events	<ol style="list-style-type: none"> 1. The Institution has chosen to use the <u>Government Employee Training Act (GETA)</u> definition for training events for both its federal and trust employees. <ol style="list-style-type: none"> a. The <i>Training Act</i> defines training as the process of providing for and making available to an employee, and placing or enrolling the employee in, a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields which will improve individual and organizational performance and assist in achieving the agency's mission and performance goals. b. Training includes meetings and conferences when: <ol style="list-style-type: none"> i. The purpose of the conference is educational; ii. The content is germane to improving the employee's performance; iii. Most of the conference consists of planned, organized exchanges of information between presenters and audience; and iv. The employee will derive developmental benefits by attending. 2. Both of the following conditions must be met in order to use Smithsonian funds to provide meals to employees as part of training: <ol style="list-style-type: none"> a. The meals are incidental to the training event in that a portion of the training is conducted during the meal session. b. Attendance of the employee at the meal is necessary for full participation in the meeting or training discussions, lectures, or speeches, and the employee is not free to take the meals elsewhere without being absent from essential activities. 3. Smithsonian funds are authorized to be used to pay for employee meals when the cost of food is either incorporated into the cost of the training event or when food is required to be purchased separately. 4. The above rules do not apply to day-to-day routine SI-sponsored meetings, and Smithsonian funds may not be

	2.7 Food for Employees	SI Policy
C	Training Events (continued)	<p>used to purchase food, light refreshments or beverages for employees attending day-to-day routine meetings.</p> <ul style="list-style-type: none"> a. A day-to-day business meeting is defined as a meeting that involves discussions of the internal procedures or operations of the Smithsonian or one or more of its Units. b. The GAO has consistently held that the <i>Training Act</i> does not provide authority to use federal appropriations to supply food items at routine day-to-day business meetings, and the Institution has chosen to apply this same rule to trust funds.
		<p><u>Funding Sources:</u> Federal funds may be used to fund the cost of food (meals or refreshments for breaks) for all employees attending training events when the training supports a federally-funded program, project or activity. However, when available, trust funds can also be used to fund the cost of trust employee training costs. Alternatively, trust funds may be used to fund the full cost of federal and trust employee training, regardless of the employee's status as federal or trust.</p>
		<p><u>Special Note on Authorities:</u> <i>The Government Employees Training Act (GETA)</i> authorizes the purchase of food using federal appropriations for training events. This is consistent with the GAO ruling that appropriations available to an agency for travel expenses are available for expenses of attending training activities. Since SI appropriations are available to fund the travel expenses of federal employees and others, when the purpose of the travel meets the federal necessary expense rule, SI appropriations can also be used to fund training expenses of any SI employee when the purpose of the training supports a federally funded program, project or activity.</p>

	2.7 Food for Employees	SI Policy
D	Cultural awareness programs	<ol style="list-style-type: none"> 1. As part of the Institution's official celebration of Smithsonian Heritage Month programs, SI funds may be used to purchase small samples of ethnic foods. 2. Smithsonian Heritage Month programs are: Black History Month; Women's History Month; Asian American and Pacific Islander Heritage Month; Hispanic Heritage Month; and Native American Heritage Month. <p><u>Funding Sources:</u> Federal or trust funds are available for this purpose.</p>
E	Work Under a Crisis Situation	Please refer to 2.6 <i>Emergency Operations</i> , page 31.
F	Work Under Non-Crisis Situations	Please refer to 2.6 <i>Emergency Operations</i> , page 32.
G	Day-to-Day routine staff meetings	<ol style="list-style-type: none"> 1. A day-to-day business meeting is defined as a meeting that involves discussions of the internal procedures or operations of the Smithsonian or one or more of its Units, even when a small number of guests may be in attendance. 2. Smithsonian funds may not be used to purchase food or light refreshments for day-to-day routine staff meetings. These costs are always considered personal expenses of the employee. <ol style="list-style-type: none"> a. Please refer to <i>Section C.4</i>, above on page 38, for additional information on restrictions related to day-to-day routine staff meetings. <p><u>Funding Sources:</u> Neither federal nor trust funds are authorized to purchase food for employees for routine day-to-day staff meetings.</p>

	2.7 Food for Employees	SI Policy
H	Special SI Meetings	<ol style="list-style-type: none"> 1. A special SI meeting is an activity not elsewhere described in <i>Section 2.7</i>, including collaborative activities involving staff from across the Institution, a welcoming meeting for a new Unit Director, or activities that involve both internal and external participants. 2. When it is determined that provision of food or light refreshments to meeting participants is appropriate, and this expense meets the definition of a necessary expense, Smithsonian funds may be used to purchase food or light refreshments. Advance written approval for each activity or event is needed by the approving officials below. <ol style="list-style-type: none"> a. A Unit Director is authorized with advance written approval from the Unit's Under Secretary (or equivalent). b. Direct reports of the Secretary, the Secretary, or the Chair of the Board of Regents are authorized with advance written approval from the Chief of Staff to the Secretary. c. The Secretary or the Chair of the Board of Regents is authorized with advance written approval from the Chief Financial Officer. <p><u>Funding Sources:</u> Unrestricted trust funds can be used to purchase food or light refreshments for special employee meetings.</p>
I	Provisions and Food for Break Rooms	<ol style="list-style-type: none"> 1. Smithsonian funds may not be used to purchase coffee, tea, soda, juice, hot chocolate (or other beverages), crackers, chewing gum, pretzels, candy, cookies (or other snacks) or provisions (sugar, sweetener, stirrers, etc.) to be consumed on a day-to-day basis by employees in their office locations. 2. These costs are always considered personal expenses of the employee. <p><u>Funding Sources:</u> Neither federal nor trust funds are authorized to stock employee break rooms.</p>
J	Retirement Parties & Celebrations	<ol style="list-style-type: none"> 1. When a federal or trust employee retires, SI funds may be used to purchase food and light refreshments for a farewell event. 2. If the cost of the function exceeds \$1,000, written advance approval is required as described below.

	2.7 Food for Employees	SI Policy
J	Retirement Parties and Celebrations (continued)	<p>a. Unit Directors are authorized to spend more than \$1,000 for retirement parties for staff within their own offices only with advance written approval from the Unit's Under Secretary (or equivalent).</p> <p>b. Direct reports of the Secretary, the Secretary, or the Chair of the Board of Regents are authorized to spend more than \$1,000 for retirement parties for staff within their own offices only with advance written approval from the Chief of Staff to the Secretary.</p> <p>c. The Secretary or the Chair of the Board of Regents are authorized to spend more than \$1,000 for retirement parties for staff within their own offices only with advance written approval from the Chief Financial Officer.</p> <p>3. Employees must meet certain age and years of service criteria to retire from the Smithsonian.</p> <p>a. For federal employees, see the retirement criteria at: http://ohr.si.edu/docs/benefits/FederalBenefitsHandbook.pdf.</p> <p>b. For trust employees, retirement is defined as a combined age and service equal to or greater than 60 years (but with a minimum age of 50 and a minimum service of five years.)</p> <p>4. Smithsonian funds may not be used to purchase food, refreshments or beverages for any other types of employee farewell parties. These costs are always considered personal expenses of the employees hosting and/or participating in these events. See the next section, <i>K: Unit Social Functions</i>, for more information.</p> <p><u>Funding Sources:</u> Only unrestricted trust funds can be used to purchase food or light refreshments for employee retirement functions.</p>

	2.7 Food for Employees	SI Policy
K	Unit Social Functions	<ol style="list-style-type: none"> 1. Unit social functions are those that celebrate or recognize the following types of employee events: <ol style="list-style-type: none"> a. Employee farewell party that is not a retirement b. Introduction of new staff (except for formal installation ceremonies of a new Smithsonian Secretary and the welcoming meeting of a new Unit Director) c. Birthdays, baby and wedding showers, and other similar social functions 2. These costs are always considered personal expenses of the employee(s) hosting and/or participating in these events. 3. Smithsonian funds may be used to purchase food for employee award recognition programs, including length of service awards. Please refer to <i>Section 2.2.B</i> for additional information. <p><u>Funding Sources:</u> Neither federal nor trust funds are authorized to purchase food for employees for these unit social functions.</p>
L	Official SI-Wide Employee Events	<ol style="list-style-type: none"> 1. For the pan-Institutional “employee morale and productivity” events listed below, Smithsonian funds may be used for food, light refreshments, and non-alcoholic beverages: <ol style="list-style-type: none"> a. Annual Smithsonian holiday party b. Annual Smithsonian staff picnic c. Networking reception for interns d. Visitor Information & Associates’ Reception Center (VIARC) or Unit-hosted volunteer events/receptions e. Smithsonian Unsung Heroes Award program f. Other SI-wide award recognition programs g. Annual Combined Federal Campaign (CFC) kick-off events, victory celebrations, and other events used to build support for CFC

	2.7 Food for Employees	SI Policy
L	Official SI-Wide Employee Events (continued)	<p>2. Smithsonian funds may also be used to purchase food, light refreshments and non-alcoholic beverages for internal research collaboration and recognition events such as:</p> <ul style="list-style-type: none"> a. Congress of Scholars b. Distinguished Lecture Series c. Senate of Scientists
		<p><u>Funding Sources:</u> Only Smithsonian trust funds will be used for official SI-wide employee events.</p>
M	Bottled Water	<p>1. Smithsonian funds may not be used to purchase bottled water (individual bottles or contract services), except for locations where the Office of Safety, Health and Environmental Management (OSHEM) has analyzed drinking water and issued a report that the tap water is unfit to drink, or at remote locations where drinking water is not otherwise available to SI staff.</p> <p>2. This guidance addresses bottled water within the context of normal operations. For information on provisions for staff during “continuity of operations,” please refer to the Disaster Management Program (SD 109) and OFEO Business Continuity Master Plan.</p>
		<p><u>Funding Sources:</u> When OSHEM has authorized use of bottled water for daily staff use, the cost should be split-funded based on the proportion of staff that are federal and trust. Or alternatively, the entire cost can be funded with trust funds.</p>

2.8 Food for Individuals Other Than Employees

General Guidelines: Unless specifically authorized, federal appropriations are not available to purchase food, and the same basic rules stated in the previous *Section 2.5* apply to non-government individuals. Authority to use federal funds to purchase food/beverages for individuals other than employees is provided by the [Government Employees Incentive Awards Act](#) and the [Government Employees Training Act](#), and other EEO program provisions. The Institution has significantly more flexibility in using its trust funds to purchase food for individuals other than employees, and the following use of fund policies take advantage of this flexibility.

Individuals other than employees include volunteers, and academic appointees such as interns, Fellows, and research associates. For this *Handbook*, the definition of a Smithsonian volunteer is one who, for civic, charitable, or humanitarian reasons, and at the Smithsonian's request, provides a service to the Smithsonian without promise, expectation, or receipt of compensation. A volunteer is not an employee, Fellow, paid intern, recipient of an academic appointment, research associate, emeritus, or visitor when the individual is acting in one of the aforementioned capacities; however, individuals in these categories separately may serve as volunteers. For purposes of this *Handbook*, contractors are neither employees nor non-employees. For contractual guidance on managing the use of funds with contractors, please consult the Chief Financial Office, Office of Contracting.

	Activity	SI Policy
A	Training Events, Conferences, & Meetings	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase food and beverages for non-employee individuals when: <ol style="list-style-type: none"> a. The individual is performing a service (making a presentation, conducting training, collaborating, participating in discussions, etc.) at a Smithsonian sponsored or co-sponsored training event or conference. b. The individual is performing a service as described in Item 1.a above at a business meeting or event, but not day-to-day business meetings, when the event does not meet the training or conference definition, but does meet each of the following conditions: <ol style="list-style-type: none"> i. The event is sponsored or co-sponsored by the Smithsonian

	2.8 Food for Individuals Other Than Employees	SI Policy
A	Training Events, Conferences, & Meetings (continued)	<p>ii. The event lasts for more than four hours</p> <p>iii. The food is incidental to the event</p> <p>iv. Partaking of food is necessary for the meeting participants to participate fully in the event/meeting</p> <p>v. Participants will miss formal discussions, lectures, speeches, etc. if they take food elsewhere</p> <p>c. The non-employee individual has been invited to attend a formal employee recognition or award ceremony.</p> <p>d. The non-employee individual is a guest speaker or is conducting a program in connection with an official Smithsonian EEO/cultural awareness program of the CFC kickoff or key worker meetings.</p> <p>2. Both internal and external participants are eligible to partake in the refreshments that have been designated as necessary expenses for conducting the event. Please see <i>Food for Employees, page 35</i>, for procedures pertaining to SI employees during business meetings with non-employee colleagues.</p> <p><u>Funding Sources:</u> Federal funds can be used for <i>Items A.1.a</i> and <i>A.1.b</i> above, provided that the activity constitutes a federally-funded Smithsonian mission; otherwise trust funds must be used. Federal funds can be used for <i>Item A.1.c</i> above, when the employee(s) receiving the award/recognition is a federal employee. When the only employees being recognized in an award ceremony are trust, then only trust funds may be used for <i>Item A.1.c</i>. Federal or trust funds may be used for <i>Item A.1.d</i> above.</p>

	2.8 Food for Individuals Other Than Employees	SI Policy
B	Exhibition openings, building dedications, receptions, “by invitation only” events addressed to individuals or groups; public events and programs; public receptions following lectures; and community events	<p>1. When the Unit Director (or his/her designated special event coordinator) determines that food and beverages constitute a necessary expense for a special event, Smithsonian funds may be used. The special events included in this guideline are:</p> <ul style="list-style-type: none"> a. Exhibition openings b. Building dedications c. Receptions d. Personal invitation-only events e. Group invitation-only events f. Public events g. Public programs h. Public receptions following lectures and programs i. Community events <p>2. For all the events listed above, the Institution’s Guidelines for <i>Special Event Spending</i> policies shall be followed. Please refer to the <i>Appendix</i> on page 83.</p> <p>3. Employees, volunteers, and academic appointees (interns, Fellows, and research associates) attending these events (as guests or working staff) are authorized to consume food and beverages available to all event participants.</p> <p><u>Funding Sources:</u> Federal funds can be used for these expenses only when special statutory authorization exists or when these costs are clearly documented in the Institution’s Congressional budget request. Otherwise, trust funds must be used for this purpose.</p>

	2.8 Food for Individuals Other Than Employees	SI Policy
C	Development and fundraising activities	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase food and beverages for individuals other than Smithsonian employees as part of SI development activities, as defined by Section 1.2, Development, page 9. 2. Employees, volunteers, and academic appointees (interns, Fellows, and research associates) attending these events (as guests or working staff) are authorized to consume food and beverages available to all event participants. <p>Funding Sources: Federal funds can be used for these expenses only when specific statutory authorization exists to use SI appropriations for development/fundraising activities. Otherwise, only trust funds can be used for this purpose.</p>
D	Business activities	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase food and beverages for individuals other than Smithsonian employees as part of Smithsonian business activities, as defined by Section 1.4, Business Activities, page 13. 2. Employees, volunteers and academic appointees, including interns, Fellows, and research associates, attending these events (as guests or working staff) are authorized to consume food and beverages available to all event participants. <p>Funding Sources: Only trust funds can be used for the expenses to purchase food and beverages for business activities.</p>
E	Official Representation activities	<ol style="list-style-type: none"> 1. Please refer to <i>Section 1.3, page 11</i>, of the <i>Handbook</i> for a definition of Official Representation. 2. Official Representation does not include meetings with any congressional government official for the purpose of influencing the official. The statute that is commonly referred to as the Anti-Lobbying Act (18 U.S.C. § 1913) prohibits any use of federal funds to pay for any item or device that is intended to seek favor, adoption, or opposition to any legislation or appropriation. In addition, because the Smithsonian is a tax-exempt, 501(c)(3) organization, the use of trust funds for lobbying activities is limited statutorily. Please see <i>SD 300, Use of Funds for Lobbying Purposes</i>, for further information about the use of trust funds when dealing with government officials.

	2.8 Food for Individuals Other Than Employees	SI Policy
E	Official Representation Activities (continued)	3. Smithsonian funds are authorized to be used to reimburse staff for the cost of meals for non-employees during conduct of Official Representation activities when the Unit Director deems the meal as a necessary expense in conducting the official representation. (Note: GSA per diem limits are not applicable to meals for non-employees. See Section 2.6 on page 36 for guidance on reimbursement for staff meals during Official Representation.
		Funding Sources: The Institution does not have specific statutory authorization to spend federal funds on official representation activities. Therefore, only trust funds can be used for this purpose.
F	Volunteer/Academic Appointee Events & Receptions	<p>1. Smithsonian funds may be used to purchase food and beverages for SI-wide volunteer and academic appointee events and receptions (including interns, Fellows, or academic appointees) when one of the two conditions is met:</p> <ul style="list-style-type: none"> a. The Director of Communications and External Affairs determines that these items constitute a necessary expense for events hosted, co-hosted, or endorsed (in writing) by the Director of Visitor Information and Associates' Reception Center (VIARC). b. The Unit Director determines that these items constitute a necessary expense for events hosted by the Unit. <p>2. Employees, volunteers, and academic appointees, attending these events (as guests or working staff) are authorized to consume food and beverages available to all event participants.</p>
		<u>Funding Sources:</u> Federal funds can be used for these expenses only when special statutory authorization exists or when these costs are clearly documented in the Institution's congressional budget request. Otherwise, only trust funds should be used for this purpose.

2.9 Gifts for Employees

General Guidelines: Smithsonian funds may not be used to purchase gifts of any kind for Smithsonian employees, including items such as: flowers, meals, t-shirts, gift certificates to restaurants, movie tickets, coffee mugs, or plants except as authorized below. Please note that performance awards are not considered gifts. For information about Smithsonian performance awards, please refer to *Section 2.2, Awards (Non-Monetary) for Employees, page 20.*

	Activity	SI Policy
A	Official Smithsonian Morale Programs	<ol style="list-style-type: none"> 1. When explicitly approved, in advance and in writing, by the Secretary, Smithsonian funds may be used to purchase gifts for Smithsonian employees when all of the following criteria are met: <ol style="list-style-type: none"> a. The gifts will instill a positive attitude toward the Institution and are expected to become an important component of overall staff morale efforts b. The gifts are available to all Smithsonian employees c. The gift has been approved by the Secretary 2. Employee gifts that have been approved by the Secretary include: <ol style="list-style-type: none"> a. T-shirts provided to employees at the annual holiday party. b. T-shirts provided to employees participating in the Smithsonian Healthy and Active Program for Employees (SHAPE) fitness walks and programs. c. Small gifts to be raffled off at the annual holiday party. <p><u>Funding Sources:</u> Only Smithsonian trust funds will be used for the above activities.</p>

	2.9 Gifts for Employees	SI Policy
B	Official Employee Farewell Memento	<p>1. At the supervisor's discretion, Smithsonian funds may be used to purchase an officially sanctioned employee farewell memento to be presented upon an employee's departure when both of the following conditions are met:</p> <ul style="list-style-type: none"> a. The gift has been designated by the Office of Human Resources (OHR) as an official employee farewell memento. b. The gift is presented at a formal farewell or retirement ceremony. <p>2. The Director of OHR, working with the Smithsonian Community Committee, shall develop and publish a list of authorized Smithsonian employee farewell mementos.</p> <ul style="list-style-type: none"> a. The approved employee farewell memento(s) will be included in the Non-Monetary Honorary Awards Catalog, which will be forthcoming. <p>3. Smithsonian funds may only be used to purchase a gift from this authorized list.</p>
		<p><u>Funding Sources:</u> Only Smithsonian trust funds will be used to purchase the employee farewell mementos. Units that do not have trust funds will contact their Under Secretary (or equivalent) for funding assistance.</p>
C	Length of Service (Career Service) Recognition	<p>Items provided to Smithsonian employees to recognize their career service are considered awards and not gifts. Please refer to <i>Section 2 – Awards (Non-Monetary) for Employees, Section 2.b, page 22</i>, for guidance about length of service / career service awards.</p>

2.10 Gifts for Others

General Guidelines: The purchase of gifts for individuals other than employees is an allowable and necessary expense when these gifts support activity related to development, business activities, board support, volunteer activity and/or official representation. Sometimes these gifts are presented as recognition to non-employees for service to the Institution. For this *Handbook*, individuals other than employees include volunteers, docents, and academic appointees. (Examples of academic appointees include interns, Fellows, and research associates.)

For purposes of this *Handbook*, contractors are neither employees nor non-employees. For contractual guidance on managing the use of funds with contractors, please consult the Chief Financial Office, Office of Contracting.

	Activity/Limits	SI Policy
A	Development and Advisory Board Activities	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase gifts for the following individuals when these gifts are part of donor cultivation/recognition and/or board member recognition activities. <ol style="list-style-type: none"> a. Donors and representatives of sponsors (current and prospective) b. Board members 2. Gifts and mementos should have a Smithsonian-related theme. Suitable gifts include these and other like items: <ol style="list-style-type: none"> a. Items from Smithsonian retail stores, online stores, or catalogue b. Reproductions or representations of items in Smithsonian collections (e.g., gems, flags, prints, aircraft models, and recordings) c. Gift baskets and floral arrangements 3. When part of donor cultivation activities, Smithsonian funds may be used to purchase gifts for donors and representative of sponsors to recognize life events (e.g., birthday, anniversary, wedding, hospitalization); a business event (e.g., new job, promotion), or holiday. 4. For funding limitations on gifts, please see <i>Section E</i> below: <i>Funding Limitations for All Gifts</i>. <p>Funding Sources: Only Smithsonian trust funds will be used for the above activities, unless the gift is part of an activity for which federal funds have been appropriated, such as fundraising.</p>

	2.10 Gifts for Others	SI Policy
B	Business Activities	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase gifts for business clients when this cost is directly related to or associated with operating the business activity and constitutes an appropriate client entertainment activity. 2. When part of an activity to cultivate business clients, Smithsonian funds may be used to purchase gifts for business clients to recognize life events (e.g., birthday, anniversary, wedding, hospitalization); a business event (e.g., new job, promotion), or a holiday. 3. Please see <i>Section 1.4.5, Use of Funds By Activity: Business Activities, page 13</i>, for guidance about allowable expenditures. 4. For funding limitations on gifts, please see <i>Section E</i> below: <i>Funding Limitations for All Gifts</i>. <p><u>Funding Sources</u>: Only Smithsonian trust funds will be used to purchase gifts in the conduct of business activities.</p>
C	Volunteer & Academic Appointee Recognition	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase gifts to recognize volunteer, and academic appointee support (including interns, Fellows, and research associates) associated with completion of a major project/event, recognition of years of service, and/or special acts of service. 2. Gifts and mementos should have a Smithsonian-related theme. Suitable gifts include these and other like items: <ol style="list-style-type: none"> a. Items from Smithsonian retail stores, online stores, or catalogue b. Reproductions or representations of items in Smithsonian collections (e.g., gems, flags, prints, aircraft models, or recordings) c. Gift baskets and floral arrangement 3. Smithsonian funds may <u>not</u> be used to purchase gifts for volunteers, and academic appointees when these gifts are recognizing a life event (e.g., birthday, anniversary, wedding, or hospitalization); a business event (e.g., new job, promotion), or a holiday. 4. For funding limitations on gifts, please see <i>Section E</i> below: <i>Funding Limitations for All Gifts</i>.

	2.10 Gifts for Others	SI Policy
C	Volunteer & Academic Appointee Recognition (continued)	<u>Funding Sources:</u> Only Smithsonian trust funds will be used for the above activities, unless the gift is part of an activity for which federal funds have been appropriated, such as fundraising.
D	General Purpose Official Representation Activities	<ol style="list-style-type: none"> 1. Smithsonian funds are authorized to be used to purchase gifts that are part of official representation activities. 2. Gifts that are part of cultural exchanges should be representative of the types of gifts customarily exchanged between SI and foreign governments or native/indigenous communities, and be consistent with international and relevant protocol. 3. Other official representation gifts should have a Smithsonian-related theme. Suitable gifts include these and other like items: <ol style="list-style-type: none"> a. Items from Smithsonian retail stores, online stores, or catalogue. b. Reproductions or facsimiles of items in our collections (e.g., gems, flags, prints, aircraft models, or recordings) c. Gift baskets and floral arrangements. 4. For funding limitations on gifts, please see <i>Section E</i> below: <i>Funding Limitations for All Gifts</i>. <p><u>Funding Sources:</u> Only Smithsonian trust funds will be used for the above activities, unless the gift is part of an activity for which federal funds have been appropriated, such as fundraising. When official representation gifts are given to foreign individuals, the Institution must use trust funds, unless the gift is part of an activity for which federal funds are authorized.</p>

	2.10 Gifts for Others	SI Policy
E	Funding Limitations for All Gifts	<ol style="list-style-type: none"> 1. The value of all gifts purchased with Smithsonian funds (in Sections A, B, C, and D above) must be consistent with the limitations set by the <u>General Services Administration (GSA) Federal Management Regulation Part 102-42.10, "Utilization, Donation and Disposal of Foreign Gifts and Decorations."</u> Unit Directors are approving officials for all such gifts. <ol style="list-style-type: none"> a. The Institution has elected to apply the GSA gift limit to all gifts purchased, including those purchased with trust funds. <ol style="list-style-type: none"> i. The value of the gift should be commensurate with the service provided and the duration of the relationship, and should be reasonable and not lavish. The maximum gift limit is currently \$335 ii. This gift limit is valid for the three-year time period effective August 20, 2010 2. Gifts costing more than the GSA gift limit must be authorized and approved in advance and in writing by the applicable Smithsonian approving official: <ol style="list-style-type: none"> a. Donor and Sponsor Representative Gifts: Director of Advancement (or his/her designee) b. Business Client Gifts: <ol style="list-style-type: none"> i. Smithsonian Enterprises President for SE business clients ii. Smithsonian CFO for all other business clients c. Volunteer/Academic Appointee/ Gifts: Director of Communications and External Affairs d. Gifts for individuals as part of official representation activities: <ol style="list-style-type: none"> i. Under Secretaries or their equivalents for their reporting Units ii. Chief of Staff to the Secretary for the Secretary's direct reports

	2.10 Gifts for Others	SI Policy
E	Funding Limitations for All Gifts (continued)	<p>e. Board Member Gifts:</p> <ul style="list-style-type: none"> i. Museum Advisory Boards: Applicable Under Secretary or equivalent ii. Smithsonian National Board: Director of Advancement iii. Board of Regents: Smithsonian Secretary (or his designee) <p>3. All gifts costing more than the GSA gift limit given to a foreign individual must also be reported to the Department of State.</p> <ul style="list-style-type: none"> a. The Office of Special Events and Protocol (OSEP) is responsible for preparing the Institution's annual report to the Department of State. <ul style="list-style-type: none"> i. The OSEP Director will establish annual reporting guidelines and provide these separately to all SI Units. ii. Units should keep written records of all gifts purchased for foreign individuals that exceed the GSA gift limit. b. Please see <i>Section 1 Use of Funds By Activity, 1.3.8, page 12</i>, for additional information on gifts valued at more than \$335 given to foreign individuals.

2.11 Greeting Cards

General Guidelines: Smithsonian funds may be used to purchase greeting cards only when the recipient of the cards is an individual other than a Smithsonian employee and the use of greeting cards supports a mission-related goal, such as development, official representation, board support, business activities or volunteer programs. Federal funds are not authorized to be used for this purpose in the absence of specific authority.

	<i>Recipient of Card</i>	<i>SI Policy</i>
A	Individuals Other Than Smithsonian Employees	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to pay the cost of greeting cards (or greetings in the form of a letter, either print or electronic) when both of the following criteria are met: <ol style="list-style-type: none"> a. The greeting card (including all costs associated with producing and delivering these cards) is a necessary expense associated with one of the following mission activities: <ol style="list-style-type: none"> i. Development ii. Business activities iii. Official representation iv. Recognition of volunteer and board member support b. The greeting card is purchased to recognize one of the following events: <ol style="list-style-type: none"> i. Holiday greetings ii. Life event (e.g., birthday, birth/adoption, death, engagement/wedding, serious illness, hospitalization) iii. Professional achievement (e.g., promotion, new job, new office) iv. Business relationship (e.g., thank you for meeting, referral) 2. Federal appropriations will never be used for any cost associated with obtaining or sending greeting cards (including SI franked envelopes), unless the greeting card is part of an activity (such as donor cultivation) that has been specifically authorized by Congress. <p>Funding Sources: Only Smithsonian trust funds can be used unless federal funds have been specifically authorized.</p>

	2.11 Greeting Cards	SI Policy
B	Smithsonian Employees	<ol style="list-style-type: none"> 1. The cost of greeting cards purchased by Smithsonian employees and provided to Smithsonian employees is a personal expense to be borne by the employee who ordered and sent them. There are no exceptions. 2. The use of Smithsonian stationery and franked envelopes to send greetings to Smithsonian employees in lieu of greeting cards is also an unauthorized expense. 3. The use of Smithsonian computers, telecommunications devices, and networks for the purpose of creating or sending greeting cards is covered in the “<i>Rules for Users</i>” section of SD 931 (<i>Use of Computers, Telecommunication Devices and Networks</i>) and is not permitted.
		<u>Funding Sources</u> : Smithsonian funds are not authorized for this purpose.

2.12 Guests of the Smithsonian Institution

General Guidelines: A guest is an individual who is invited by a Smithsonian employee or official to attend an activity or event in cases where the guest's presence is dictated by tradition or protocol or when the guest has a specific role in the activity. Smithsonian funds may be used to fund expenses associated with a guest's participation in Smithsonian activities under the conditions defined below.

	Activity	SI Policy
A	Guest at Advisory Board, Development, Official Representation, or Business Activities	<ol style="list-style-type: none"> 1. When hosting an activity or event, a Unit Director, member of the Secretary's Cabinet, and the Secretary are authorized to invite one or more personal guests to participate in the event or activity, and the use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense. 2. With advance written approval, an employee working for the Unit who is hosting an event or activity is authorized to invite one or more personal guests to participate in the event. The use of SI funds to purchase food for these individuals is authorized when these costs represent a necessary expense. <ol style="list-style-type: none"> a. The Unit Director is the approving official for guests invited by employees assigned to his/her unit. b. A separate Use of Funds approval is not required when the employee's guest is otherwise included in a Smithsonian-funded Special Event approval document. 3. When attendance of Smithsonian employee or Regent guests constitutes a necessary expense, Smithsonian trust funds may be used to purchase meals or light refreshments for all event participants. 4. The participation of a guest at a local activity is considered more likely to be a "necessary expense" when: <ol style="list-style-type: none"> a. The individual has a role in the activity, such as the host or hostess at a dinner in his/her home. b. The presence of the guest is dictated by tradition or protocol. For example, an employee's spouse may be included in a Smithsonian activity when spouses of invitees are expected to attend.

	Activity	SI Policy
A	Guest at Advisory Board, Development, Official Representation, or Business Activities (continued)	5. For purposes of this <i>Handbook</i> , a personal guest of the employee may include (but is not limited to): his/her spouse, domestic partner, parent, child, family member, business colleague, or friend.
		<u>Funding Source</u> : Only unrestricted trust funds may be used to purchase meals for guests of the Institution.

2.13 Historical Portraits

General Guidelines: The Institution maintains and displays in Smithsonian facilities original portraits of former Smithsonian Secretaries. Trust funds are used to commission and maintain portraits of former Smithsonian Secretaries as a historical record. No other Smithsonian officials will have official portraits made without written approval, in advance, by the Board of Regents and the Smithsonian Secretary. All portraits of Smithsonian Secretaries (and other officials) become part of the Smithsonian collections.

	Activity	SI Policy
A	Portraits of the Smithsonian Secretary	<ol style="list-style-type: none"> 1. The commissioning of original portraits of former Secretaries of the Smithsonian Institution, near or after completion of their term in office, is considered a necessary expense because of its historical public purpose. 2. The Chief of Staff to the Board of Regents shall determine a budget target for the cost of each historical portrait, after consulting with the appropriate curator at the Smithsonian National Portrait Gallery to establish current market pricing for similar portraits of Federal Cabinet officials.
		<u>Funding Sources:</u> Smithsonian federal or trust funds are allowed for Secretarial portraits.
B	Portraits of Other Smithsonian Officials	<ol style="list-style-type: none"> 1. Smithsonian funds may not be used to fund the commissioning of portraits of any Smithsonian officials, including Board of Regents' members or other staff (other than the Secretary) except with written approval, in advance, by the Chair of the Board of Regents and the Smithsonian Secretary. In the case of a restricted gift to fund a portrait, the written approvals by the Chair of the Board of Regents and the Smithsonian Secretary must be obtained before accepting the gift. 2. The Chief of Staff to the Secretary shall determine a budget target for the cost of these historical portraits after consulting with the appropriate curator at the Smithsonian National Portrait Gallery to establish current market pricing for portraits.
		<u>Funding Sources:</u> If specifically approved, only Smithsonian trust funds can be used to fund portraits of other SI officials.

2.14 Honoraria

General Guidelines: An honorarium is an expression of appreciation in cash or kind to an individual for a contribution of time, expertise, and/or participation in a Smithsonian activity or event. Such tokens of appreciation are usually presented after the fact, when there was no prior expectation of a payment of any kind, and when there was no prior agreement, verbal or in writing, that any payment would be made to the individual. Honoraria are not payments for which SI is legally or traditionally required to make, such as payments under service contracts or purchase order awards. Honoraria are not to be used to circumvent normal procurement procedures for professional services or consultants.

At the Smithsonian, honoraria are often presented to guest speakers, members of panels, performance and visual artists, and other individuals. With advance approval from an employee's supervisor and clearance from the Ethics Counselor in the Office of General Counsel, SI funds may be used for honoraria to Smithsonian employees when the employee's contribution to a Smithsonian activity or event occurs outside the employee's normal duty hours, and the contribution is not related to the employee's official Smithsonian duties or responsibilities.

Smithsonian employees (both federal and trust) may accept honoraria from external sources for an appearance, speech, or article when the conditions specified in *Section 7 (Outside Activities)* of [SD 103](#), Smithsonian Institution Standards of Conduct are met. Please refer to *SD 103* for further guidance on Compensated Outside Related Activities.

	Activity	SI Policy
A	Payment of Honoraria to Individuals Other Than SI Employees	<ol style="list-style-type: none"> 1. An honorarium may be considered appropriate when the following criteria are met: <ol style="list-style-type: none"> a. The individual is invited by the SI to participate in a SI-sponsored educational, research, or public service activity or event that is usually one day or less in duration, regardless of whether the activity or event is attended by SI staff only and/or the general public. b. The individual's contributions to an event are based on his/her skills or knowledge of the subject and/or objectives of the event, and not in response to detailed requirements established by the SI. c. The individual does not insist upon or request compensation.

	2.14 Honoraria	SI Policy
A	Payment of Honoraria to Individuals Other Than SI Employees (continued)	<p>2. Smithsonian funds may be used to pay an honorarium when the Unit determines the recipient's contributions are worthy of an honorarium and establishes the amount of the honorarium.</p> <p>3. Smithsonian units must follow established accounting procedures for processing honoraria to ensure proper IRS 1099 reporting.</p> <p><u>Funding Sources:</u> When the activity resulting in the payment of an honorarium can be directly linked to a program, project or activity for which federal funds have been appropriated, federal funds may be used to pay the costs of the honorarium. Otherwise, Smithsonian trust funds must be used for this purpose.</p>
B	Payment of Honoraria to Smithsonian Employees	<p>1. There may be limited instances when an honorarium can be paid to an individual who is a Smithsonian employee.</p> <p>2. No honorarium may be awarded unless the Smithsonian employee has received approval to use annual leave while participating in the activity, or the proposed activity takes place outside the employee's regular duty hours.</p> <p>3. For a Smithsonian employee to be eligible to receive a Smithsonian honorarium, the following three criteria must be met:</p> <ul style="list-style-type: none"> a. An SI supervisor or manager must formally request that an employee contribute and volunteer their time and expertise to a Smithsonian program or activity, that is not considered part of the employee's official duties and responsibilities. b. The employee must complete a Request for Paid Outside Activities form (available on the Office of General Counsel website (OGC) and receive approval from his or her supervisor for the proposed activity. c. The employee must submit the completed form to OGC, and an OGC Ethics Officer must provide written clearance approving the use of an honorarium in advance of the proposed activity. <p>4. No Smithsonian funds shall be used to pay honoraria to SI employees when their contributions of time, expertise, or participation in activities are related to their official SI duties.</p>

	2.14 Honoraria	SI Policy
B	Payment of Honoraria to Smithsonian Employees (continued)	4. Units wishing to recognize Smithsonian employees for their official duty contributions to Smithsonian programs and activities may do so, but this recognition should be in the form of a performance or other recognition award. Please refer to <i>Section 2.2, Awards (Non-Monetary) for Employees, page 20</i> , for guidance about appropriate forms of recognition for an employee who has contributed time, expertise, or participation in activities related to their official job functions.
		<u>Funding Sources</u> : When the activity resulting in the payment of an honorarium can be directly linked to a program, project or activity for which federal funds have been appropriated, federal funds may be used to pay the costs of the honorarium. Otherwise, Smithsonian trust funds must be used for this purpose.
C	Retaining Honoraria Paid to Smithsonian Employees from External Sources	1. Please refer to SD 103 , <i>Section 7</i> , for guidance on when Smithsonian employees may retain honoraria in a personal capacity.

2.15 Kitchen Equipment/Supplies

General Guidelines: Kitchen equipment includes appliances such as refrigerators, icemakers, microwaves, commercial coffee makers, and dishwashers when these appliances are used for central “kitchen” areas.

Federal appropriations may be used to purchase these items when it has been determined that the availability of these items contributes to efficient operations and the health and safety of personnel, and these items are important factors that can help in recruiting and retaining a strong work force. Having these centralized appliances, and fewer extension cords or overloaded circuits, also promotes more efficient energy use and facilities safety.

	Activity	SI Policy
A.	Appliances for Employee Use	<p>1. Smithsonian funds may be used to purchase kitchen appliances such as microwave ovens, ice makers, refrigerators and commercial coffee makers, subject to each of the following conditions:</p> <ul style="list-style-type: none"> a. The appliances will be placed in common kitchen or mess areas that are available for use by multiple employees. b. For appliances covered by the ENERGY STAR standard, appliances purchased must be ENERGY STAR qualified products, even if the appliance purchase price is more expensive. c. The Unit Director has determined the appliance(s) provides operational benefits to the office, and that the purchase provides a safe working environment for employees by reducing or eliminating the number of personally-owned appliances, extension cords, and other potentially hazardous and energy inefficient items in the work area. d. While the purchase of commercial-grade kitchen equipment is allowed, the cost of all equipment should be reasonable, not lavish. <p><u>Funding Sources:</u> Trust funds can be used to purchase any of these appliances. Federal appropriations may be used to purchase kitchen appliances when the appliances are to be used for activities that support federally funded programs. The purchase can also be split-funded between federal and trust, based on the proportion of federal and trust activities that will benefit from these items.</p>

	2.15 Kitchen Equipment	SI Policy
B	Appliances and Equipment for Other Purposes and Uses	<ol style="list-style-type: none"> 1. To meet operational requirements associated with development, advisory board, official representation, special events, and business activities, some Smithsonian organizations routinely prepare and serve food and/or light refreshments to visitors, outside guests, donors, and business clients. These organizations may need to purchase a variety of kitchen appliances to meet these mission requirements. 2. Smithsonian funds may be used to purchase kitchen appliances and other related equipment when at least one of the following conditions is met: <ol style="list-style-type: none"> a. The appliances are purchased to operate commercial food and beverage venues for the public (e.g., restaurants in museums) or to operate staff cafeterias. b. The appliances and/or equipment are purchased to prepare and serve food and beverages on-site for meetings with outside participants (e.g., donors, business clients, trustees, board members, guests), including situations similar to the following: <ol style="list-style-type: none"> i. To hold down costs and conserve resources, many offices opt to prepare light refreshments for on-site meetings/events, rather than use catering services, and to use reusable flatware, cups, glasses, saucers, dishes, platters, etc. ii. SI Units may purchase and install appliances such as dishwashers, refrigerators, coffee makers, and microwaves to prepare for these meetings and to clean dishes/glasses/cups following the meeting. iii. SI Units may purchase consumable products such as soap and paper towels to support meetings with external participants. 3. Flatware, cups, glasses, saucers, dishes, platters and other kitchen items may not be purchased primarily for use by SI employees. Please refer to <i>Section 2.7 on page 35 and 2.8 on page 45</i>, for information about food; and to <i>Section 2.2 on page 20</i> for information about non-monetary awards. <p><u>Funding Sources:</u> Federal appropriations may be used to purchase kitchen appliances for use in staff or public</p>

	2.15 Kitchen Equipment	SI Policy
B	Appliances and Equipment for Other Purposes and Uses (continued)	cafeterias, when these requirements are included in SI budget requests, and approved by Congress. Otherwise, trust funds must be used to purchase kitchen appliances and equipment for all other purposes.

2.16 Licensing Fees (Professional Licenses, Certifications, and Accreditations)

General Guidelines: Licensing fees are defined as fees imposed by a state or local jurisdiction, usually on members of a particular profession or occupation (such as doctors, accountants, attorneys, wastewater system operators) as a prerequisite to be able to perform work or practice in that jurisdiction. Examples of authorized license fees and professional certification include: actuarial accreditation, Certified Public Accountant, Certified Government Financial Manager designation, certified professional engineering certificates, bar admission fee for attorneys, and notary public (when the individual performs Smithsonian business).

The Institution has determined that Smithsonian funds can be used to pay for or reimburse employees for expenses incurred to obtain professional credentials, state-imposed and professional licenses, professional accreditations, and professional certifications, including the costs of examinations to obtain such credentials, when resources are available and the necessary expense rule is met.

	2.16 Licensing Fees	SI Policy
A	Professional license or certification fees	<ol style="list-style-type: none"> 1. Smithsonian funds can be used to fund the cost for employees to obtain professional credentials, state-imposed and professional licenses, professional accreditations, and professional certifications when the employee is required to comply with state and local licensing regulations to perform his/her duties, and the requirement to hold a certain license is included in their official position description. 2. An employee may be required to reimburse the Institution for the whole or a portion of the cost of licenses/certification if he or she voluntarily separates from the Institution during the license duration. The terms for repayment of a professional fee may be defined in a Continued Service Agreement. If an employee signs a Continued Service Agreement with the Institution, he or she is required to comply with its terms.
		<p>Funding Sources: The cost for federal employees to obtain professional licenses and credentials is to be funded with federal appropriations or trust funds; and the cost for trust employee licenses and credentials shall be funded with trust funds.</p>

	2.16 Licensing Fees	SI Policy
B	Examination Costs for License Fees and Certifications	<ol style="list-style-type: none"> 1. In many cases, the professional license or credential program requires the employee to take and pass an examination in order to receive a particular license or certificate. Smithsonian funds may be used to pay the costs for employees to take these examinations when the employee is required to take and pass an examination to obtain a license or certification essential to their ability to perform their job duties, or to become recertified. 2. An employee may be required to reimburse the Institution for the whole or a portion of the cost of these examinations if he or she voluntarily separates from the Institution. The terms for repayment of examination fees may be defined in a Continued Service Agreement. If an employee signs a Continued Service Agreement with the Institution, he or she is required to comply with its terms. <p><u>Funding Sources:</u> The cost for federal employees to obtain professional licenses and credentials is to be funded with federal appropriations, and the cost for trust employees shall be funded with trust funds.</p>

2.17 Memberships (Fitness and Athletic Clubs – Including Purchase of Fitness Equipment)

General Guidelines: The federal government has determined that some physical fitness programs qualify as preventive health services and wellness programs and that federal appropriations may be used to purchase organizational memberships to fitness clubs and to purchase fitness equipment and supplies.

	Activity	SI Policy
A	Organizational Fitness Club Memberships	<ol style="list-style-type: none"> 1. Smithsonian funds can be used to purchase organizational fitness club memberships for groups of Smithsonian employees that have a “fitness for duty” requirement in their position description, and all other options or resources for required health programs have been considered and rejected, in writing, by the Director, Office of Safety, Health and Environmental Management (OSHEM). 2. Smithsonian funds can be used to purchase organizational fitness club memberships for employees whose jobs do not include a “fitness for duty” requirement, only when each of the following conditions is met: <ol style="list-style-type: none"> a. Membership to a fitness facility or program is part of the Institution’s preventive or wellness health program. b. All other options and resources for required health programs and services have been considered and rejected, in writing, by the Director, OSHEM. 3. In both cases 1 and 2 above, the fitness facility should provide at least one or more of the following services: <ol style="list-style-type: none"> i. Exercise facilities which contain weight training and cardiovascular equipment (e.g., treadmill, elliptical) ii. Exercise programs (e.g., spinning, yoga, aerobics classes) iii. Health services (e.g., therapeutic whirlpool, personal fitness trainer); iv. Fitness evaluations v. Laboratory blood tests.

	2.17 Fitness Clubs	SI Policy
A	Organizational Fitness Club Memberships (continued)	<p>4. The Director, Office of Safety, Health and Environmental Management (OSHEM) is required to approve purchase of all organizational fitness club memberships, those funded by SI Units or funded by OFEO, to reflect GAO and OPM concerns that this type of expenditure should be carefully monitored and undertaken only when all other resources have been considered and rejected.</p> <p>5. Smithsonian funds may also be used to provide employees access to fitness centers, when a fitness or health center is incorporated as a service in the cost of leasing office or other storage facilities.</p>
		<p><u>Funding Sources:</u> The cost of these memberships shall be proportionally funded with federal and/or trust funds based on the split of federal and trust employees, or entirely with trust funds if federal funding is not available. This funding rule does not apply when a fitness facility is made available to employees through a facility lease.</p>
B	Individual Fitness Club Memberships	<p>1. The Smithsonian will not pay for nor reimburse employees for the cost of individual memberships to fitness clubs.</p>
		<p><u>Funding Sources:</u> Not applicable.</p>
C	Fitness Equipment	<p>1. When it is determined that establishment of on-site physical fitness facilities for Smithsonian employees is a more cost-effective approach for promoting employee wellness (particularly when time spent getting to and from a fitness facility is considered), Smithsonian funds may be used to purchase/lease and maintain physical exercise equipment, when this equipment is accessible to multiple employee groups.</p>
		<p><u>Funding Sources:</u> The cost to purchase, lease, install and maintain fitness equipment can be financed with either federal or trust funds. The cost need not be proportionally funded between the two funding sources, because the majority of SI employees are federal, and employee preventive and wellness programs are a high priority of the federal government.</p>

2.18 Memberships (Professional Associations)

General Guidelines: In general, Smithsonian funds may be used to purchase memberships in professional associations and societies when the membership is in the Institution's name (not the individual's name), the membership is justified as a necessary expense in that it provides benefits to the Institution, or the membership fee is authorized under the [Government Employees Training Act, GETA](#), (5 USC § 4198(b)). Under the *GETA*, federal funds may be used to purchase membership fees for individuals when the fee is a necessary cost directly related to training or a condition precedent of undergoing the training. The Institution has decided to apply the *GETA* authorities to its trust workforce as well.

	Activity	SI Policy
A	Organizational Memberships	<p>1. Smithsonian funds can be used to purchase organizational memberships only when all of the following criteria are met:</p> <ul style="list-style-type: none"> a. The membership meets the necessary expense rule b. The membership provides benefits to the Institution, such as: <ul style="list-style-type: none"> i. Scholarly journals, professional publications, and employment information ii. Professional development iii. Contract and exchange of information with other professionals in the field iv. Scholarly research and creative work v. Ability to obtain travel/airline discounts
		<p>Funding Sources: Federal appropriations may be used if at least 75 percent of the activities that will benefit from the membership are federal activities. Otherwise, the membership should be proportionally funded with federal and trust funds, on the basis of the activities supported, or funded entirely with trust funds.</p>
B	Individual Memberships	<p>1. Smithsonian funds can be used to purchase Individual memberships only when all of the following conditions are met:</p> <ul style="list-style-type: none"> a. The membership meets the necessary expense rule and provides benefits to the Institution and the individual

	2.18 Membership Fees	SI Policy
B	Individual Memberships (continued)	<p>b. The membership fee is a necessary cost related to training or a condition precedent to undergoing the training in accordance with the <i>GETA</i>. Attendance at conferences often is considered training. Please refer to <i>Section C</i> below for additional information on fees associated with attending conferences.</p> <p>c. The membership is job-related</p> <p>d. The Unit Director approves funding the membership in advance, and in writing.</p> <p>i. If the membership is for the Unit Director, his or her supervisor will be the approving official.</p> <p>2. Individual memberships in self-improvement clubs and organizations (e.g., Toastmasters, alumni professional clubs, community professional clubs, and book clubs) do not meet the <i>GETA</i> criterion of a “planned, prepared, and coordinated program, course ... or routine of instruction.” For this reason, dues and membership fees for self-improvement and professional development clubs are personal expenses of the employee.</p> <p><u>Funding Sources:</u> For allowable memberships, federal funds shall be used to purchase memberships for federal employees and trust funds shall be used for trust employees. If federal funds are not available, trust funds may also be used to purchase memberships for federal employees.</p>
C	Membership Fees to Attend Professional Conferences	<p>1. Smithsonian funds can be used to purchase memberships that are required to attend professional association conferences when attendance at a conference is considered training under the <i>Government Employees Training Act (GETA)</i> when all the following conditions are met:</p> <p>a. The announced purpose of the conference is educational or instructional</p> <p>b. Content of the conference is germane to improving individual/organizational performance</p> <p>c. The employee will derive career development benefits by attending the conference</p>

	2.18 Membership Fees	SI Policy
C	Membership Fees to Attend Professional Conferences (continued)	<u>Funding Sources:</u> Federal funds shall be used to purchase memberships for federal employees and trust funds shall be used for trust employees. If federal funds are not available, trust funds may be used to pay membership fees for federal employees.

2.19 Memberships (Social Clubs)

General Guidelines: A social club is an entity that is organized and established primarily for pleasure, recreation, or other social, political, or religious purposes. Social clubs typically limit formal business from being conducted on the premises and limit membership based on criteria that is not necessarily related to a person's professional status. Membership in such clubs is primarily for the personal benefit of the member and does not further the purposes or mission of the Smithsonian, even if the general social interaction amongst members involves past, present, or potential philanthropic donors for the Institution.

	Activity	SI Policy
A	Social Clubs	<ol style="list-style-type: none"> 1. Smithsonian funds <u>cannot</u> be used to purchase memberships to social clubs. Examples of social clubs include the following types of clubs: <ol style="list-style-type: none"> a. Country clubs b. College alumnus/alumni clubs c. The Cosmos Club d. The Metropolitan Club e. The University Club f. The Sulgrave Club g. Fraternal organizations, such as the Knights of Columbus. 2. Smithsonian employees are not precluded from becoming members of social clubs or renewing existing memberships, but they must do so at their own expense. <p>Funding Sources: No SI funds are to be used for memberships to social clubs. This cost is considered a personal expense of the employee. There are no exceptions.</p>

2.20 Personal Protective Items (Electrolyte Replacement Fluids, Sunscreen, Insect Repellents, Hand Sanitizers, etc.)

General Guidelines: There are a number of preventive and safety items that are sometimes used by Smithsonian employees, interns and volunteers who are engaged in outside work activities and who are exposed to certain health and safety risks. These items include: non-prescription barrier creams (sunscreen, lotions to prevent skin damage from solvents/chemicals and/or poisonous plants), and various electrolyte replacement fluids such as Gatorade or PowerAde. Not all items meet the necessary expense rule.

	Activity	SI Policy
A	Electrolyte Replacement Fluids (such as Gatorade & Powerade)	<ol style="list-style-type: none"> 1. The Smithsonian Office of Occupational Safety, Health and Environmental Management (OSHEM) has determined that the use of electrolyte replacement fluids is not necessary for Smithsonian employees to keep hydrated when water is available. Therefore, no Smithsonian funds are authorized to be used to purchase these types of beverages for employees. This does not preclude employees from purchasing these beverages at their expense for their personal consumption during duty hours. 2. Please refer to <i>Section 27.M, Food for Employees, page 44</i>, for guidelines about the purchase of bottled water.
		<u>Funding Sources:</u> Not applicable
B	Sunscreen/Sunblock, Insect Repellents, Preventive Skin Lotions	<ol style="list-style-type: none"> 1. Smithsonian funds may be used to purchase non-prescriptive barrier creams (e.g., sunscreen, sunblock, insect repellents, and lotions to prevent skin damage from solvents/chemicals and/or poisonous plants) or to prevent work-related injury (sunburn/sun poisoning) and illnesses (skin rashes), when employees are required to work for extended periods of time in environments where they are exposed to these risks. 2. Smithsonian occupations primarily engaged in these activities include, but are not limited to, horticulture specialists, zoo keepers, researchers involved in field work, Folklife Festival workers, and certain building services/maintenance workers.

	2.20 Personal Protective Items	SI Policy
B	Sunscreen/Sunblock, Insect Repellents, Preventive Skin Lotions (continued)	<u>Funding Sources:</u> Federal appropriations and trust funds are authorized for the purchase of these types of items. However, federal funds should be used only when the products support the activities of federally funded programs. Otherwise, trust funds should be used, or the cost should be split proportionally based on the nature of the federal or trust activities that require the products.
C	Hand Sanitizers	<ol style="list-style-type: none"> 1. Hand sanitizers have the direct benefit of killing germs and the indirect benefit of heightening awareness of the need for good hygiene. However, hand sanitizers do not need to be in restrooms, which already have soap and water—the preferred agents for maintaining good hygiene. 2. Hand sanitizers for employees, interns and volunteers: <ol style="list-style-type: none"> a. Most Smithsonian employees, interns and volunteers have soap and water readily available in restrooms in a reasonable distance from their work sites. b. However, some employees, interns and volunteers, such as museum protection officers, retail personnel, and visitor services volunteers, who are in close contact with the public and who handle money, personal belongings of our visitors, etc., are not able to leave their work stations to wash their hands frequently due to the operational requirements of their jobs. c. Smithsonian funds may be used to purchase hand sanitizers for these individuals who do not have ready access to soap and water at their work places, and for those employees that cannot leave their work stations as frequently as necessary to wash their hands.

	2.20 Personal Protective Items	SI Policy
C	Hand Sanitizers (continued)	<p>3. Hand Sanitizers for the Public and Visitors:</p> <ul style="list-style-type: none"> a. Smithsonian visitors come in physical contact with objects and items while in our public spaces. Many Smithsonian exhibits are hands-on, and touched or handled by the visiting public. Stair rails, escalator handles, elevator buttons, and the exchange of money are some of the other ways that visitors can transmit germs. b. Locating hand sanitizers in public areas, to be used by visitors (near elevators/escalators, stores, and restaurants, at main doors) could lessen the risk of spreading illness, including to our own staff and volunteers. c. Smithsonian funds may be used to purchase hand sanitizers for the public when funds are available for this purpose.
		<p><u>Funding Sources:</u> Federal appropriations and trust funds are authorized for the purchase of hand sanitizers for volunteers and the public. When purchasing hand sanitizers for employees, federal funds can be used when the majority of employees that will use the hand sanitizers are federal employees, or if federal funds are not available, trust funds may be used. When most of the affected employees are trust, trust funds shall be used to purchase these products unless the Unit decides to split-fund the purchase between federal and trust funds based on the mix of employees that will use the sanitizer products.</p>

2.21 Traffic Tickets and Parking Fines

General Guidelines: Employees and volunteers who are driving Smithsonian vehicles, rental vehicles, GSA (or similar) vehicles, or their privately-owned vehicle (POV) on official business are responsible for complying with all traffic laws and regulations, including parking. If the employee or volunteer receives a traffic ticket while driving or parking Smithsonian or POV vehicles, the employee is responsible for paying all fines.

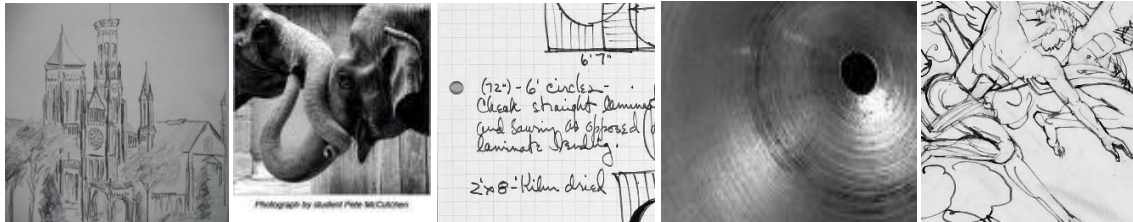
	Activity	SI Policy
A	Traffic tickets and parking fines	1. These expenses are always considered a personal expense of the employee or volunteer and Smithsonian funds are not available to pay these costs or to reimburse employees/volunteers for these costs even if the citation or ticket was received while the employee/volunteer was performing official business.
		<u>Funding Sources:</u> Not applicable.

2.22 Waiver of Policy

General Guidelines: If a Unit believes that one or more of the policies established in the *Use of Funds Handbook* is preventing or impeding accomplishment of a mission or program goal or objective, a request for a policy waiver may be submitted. Requests for waivers from the policies will be reviewed on a case-by-case basis, and approved only in rare, unusual, or exceptional circumstances. OPMB's role in reviewing each waiver request is to confirm that a waiver is necessary before higher-level waiver approval is sought. The waiver request should include a description of the proposed activity, its estimated cost, the proposed funding source, and the necessary expense rationale for the proposed expense.

	Activity	SI Policy
A	Waiver of One or More Policies	<ol style="list-style-type: none">1. All waiver requests must be submitted in writing.2. Waiver requests from Units that report to one of the Secretary's direct reports should be submitted by the Unit Director through the Director, OPMB and the Unit's Under Secretary or equivalent, in this order, for approval by the Chief Financial Officer.3. Waiver requests from the Secretary's direct reports or the Secretary's office should be submitted through the Director, OPMB, for approval by the Under Secretary for Finance & Administration/Chief Financial Officer.

Section 3 Appendices



Courtesy of Smithsonian Institution Collections Center

3.1 Appendix for GSA Food

Does the GSA per diem meal limit apply for the cost of food purchased in the local commuting area?

<i>Type of Activity or Event</i>	<i>Food for Employees</i>	<i>Food for Others</i>
Advisory Board	No	No
Development	No	No
Official Representation	Yes	No
Business Activity	No	No
Special Events	No	No

3.2 *Appendix for Special Event Spending Guidelines*

This document establishes the basic guidelines to be used by Smithsonian employees when determining the reasonableness and appropriateness of proposed Special Event and related activity expenses. These guidelines shall be followed whenever Smithsonian funds are used to finance Special Events, whether the funds are trust funds (e.g., received by donation, grant, or sponsorship, whether restricted or unrestricted) or federal appropriations. Generally, federal funds may be used for Special Events only when special statutory authorization exists.

These guidelines augment the policies and procedures contained in SD-401, *Use of Facilities for Special Events and Public Programs*, and its companion *Implementation Handbook*, both of which are available on Prism. These guidelines must be used in accordance with the Institution's other existing spending policies governing the use of federal and trust funds for special events, representational purposes, gifts, alcoholic beverages and food.

The **Smithsonian Institution Special Event Categories** chart describes a representative spectrum of events and their related purposes and how those purposes should inform the type and scale of elements that comprise the event. In which category a proposed event should fall is a joint determination between the event host and the coordinator of the event, and is approved by the authorizing official. It should be noted that the events and sample elements listed in the chart do not represent an exhaustive list, but primarily cover the most common types of Smithsonian events.

The approval process for events is detailed in the **Approval Requirements for Smithsonian Special Events** chart. Definitions of the key terms used below can be found at the end of this document.

It is the responsibility of the event host, the coordinator, the reviewing official, and the authorizing official to ensure that event elements reflect the appropriate event category, and the expenses related to these events are justifiable, reasonable and not lavish within the context of the event.

An event expense is **justifiable** if:

- It is necessary to accomplish the mission of the event.
- It is related to a cost for a good or service that was procured according to established Smithsonian contracting policies and the procedures described in SD-401. (In general, event planners must be able to demonstrate that they are following industry best practices and are remaining within the current market for all events produced with Smithsonian funds.)
- It is supported by appropriate documentation and receipts.
- It was approved by the proper authorizing official.

An event expense is **reasonable and not lavish** if:

- In light of the facts and circumstances, it is appropriate for the purpose of the event and would not be considered extravagant or wasteful given the Smithsonian's status as a public trust.

Event Planning and Internal Controls

Prior to final spending approval, all Special Events funded with Smithsonian trust funds and applicable federal funds will be developed according to the procedures outlined below:

- Annually, each Smithsonian event funding organization will establish and approve a Special Events Annual Plan. This plan will include unit events in the A and B categories together with their estimated costs and funding sources. The specific process for creating, approving and maintaining the plans will be developed together with the units to allow for their feedback and to ensure unit-level buy-in. In particular, the process will allow for the flexibility required to handle unanticipated events; therefore, the plans will be considered as "living" documents. Annual Event Plans will be updated quarterly and maintained by the event funding organization. The plans will be available upon request to support audit and other internal/external reviews.
- Event funding and host organizations will rely on the Event Coordinators as subject matter experts in determining event budgets for approval. Based on information obtained from the Smithsonian Event host organization, such as type of event, length of event, purpose, etc., Smithsonian Event Coordinators must follow federal and Smithsonian procurement regulations as well as industry best practices to research and secure price estimates for each budget line item. Event budget line items must fall in line with current fair market value.
- Special Event Coordinators will propose and submit an event scenario and estimated budget for review and approval as outlined in the following chart. The estimated event budget typically represents a not-to-exceed amount. Any additional costs above the approved not-to-exceed budget must be submitted for subsequent review and written approval by the Authorizing Official (or his/her designee).
- All Smithsonian events are subject to periodic post-event compliance audits and financial reviews. Event Coordinators and event funding organizations are required to maintain appropriate records to provide adequate justification for event elements as necessary and documentation when required for audit purposes.

Note About Donor-Sponsored Events

Once funds are received by the Institution and deposited into the Smithsonian's accounts, they become Institution funds and all expenditures of such funds must be made in accordance with Smithsonian policies and procedures, including competition. Donors and sponsors may provide input regarding the details of a Special Event, such as by suggesting a caterer, but all final decisions regarding the expenditure of Smithsonian funds must remain with the Smithsonian. The Smithsonian will not accept a gift from a donor or sponsor who seeks to impose a restriction that requires that the donor or sponsor have the ability to control the details or decisions of the Special Event.

In accordance with SD-401, in the instance when an outside organization (donor, sponsor, corporate member, etc.) makes an unrestricted gift to the Smithsonian Institution, that donor organization is invited to celebrate its donation by hosting a Special Event, in co-sponsorship with the Institution, at the outside organization's sole expense. Smithsonian space is made available for the Special Event; however, the Special Event represents essentially a private celebration of a gift or sponsorship. In such instances, the outside organization is required to make all arrangements and to pay directly for all vendors and related other expenses for the Special Event, as well as to reimburse the Institution for all internal direct expenses, such as security and facilities expenses.

Such an arrangement with a donor or sponsor, in which the donor selects vendors and pays directly for all expenses, is not appropriate when the donor or sponsor is underwriting a Special Event such as an exhibition or gallery opening, public program, lecture or other official and programmatic Smithsonian activity, and the funds for these types of expenses are deposited into Smithsonian funds. In these cases, all rules governing the use of Smithsonian funds will apply, including, but not limited to, vendor selection and competition. Further, in these instances, the Smithsonian retains the final decision-making authority in all event-related decisions and expenditures.

Smithsonian Institution Special Event Categories

Definition	Example	Sample Elements
<p>Category A: An event of major significance marking a milestone or other occasion of importance to the entire Institution or Unit and is of interest to a broad range of audiences, or could have significant impact on the Institution or one of its units. Typically highest-level events dictating the highest quality event elements.</p>	<p>Institutional Milestones (such as the 150th Anniversary)</p> <ul style="list-style-type: none"> • Groundbreaking and dedication ceremonies for new or renovated museums, research centers, major facilities etc. (such as the opening of the Kogod Courtyard, the opening of Asia Trail I at the Zoo) • Installation of a new Secretary, a Secretarial retirement or memorial service • Unit Signature Events (such as NASM Trophy Dinner, the Smithsonian Con Sabor!) • Major exhibition openings in dedicated halls and galleries (e.g., Mammal Hall, Walt-Disney Tischman African Art exhibition) or exhibits that change the footprint of a facility for an indefinite period of time • High-level protocol events, dignitary visits, official ceremonies • Constituent and/or Donor cultivation and/or recognition at highest levels 	<ul style="list-style-type: none"> • Highest quality, often formal, elements with typically high-end production costs • Formal attire may be required • Variety of high quality food and beverage offerings, usually full bar • Upgraded equipment such as glassware, stemware, linens and china • Lighting and other décor elements • Audio-visual equipment and staging for remarks and/or entertainment • Invitations and other printed materials (such as place cards or menus) are specially designed and intricate and may involve calligraphy, four color printing, engraving, etc.

Definition	Example	Sample Elements
<p>Category B:</p> <p>A significant event highlighting the Institution or one of its units that is of interest to a targeted constituency or has a business purpose that could have an impact on the Institution or one of its units. Typically industry standard level business events with moderate elements.</p>	<ul style="list-style-type: none"> • Temporary exhibition openings • Constituent events; annual giving receptions; membership fulfillment events; VIP hospitality spaces • Press events • Invitation-only receptions associated with lectures or programs • Board, Commission and similar group activities • Conferences and related activities 	<ul style="list-style-type: none"> • Mid to high quality elements with moderate production costs • Business attire may be required • Variety of quality food and beverage offerings, usually full bar • Upgraded equipment optional • Some lighting and other décor elements • Some audio-visual equipment and staging for remarks and/or entertainment • Invitations and other printed materials (such as place cards or menus) do not typically require additional design and production costs, often done in house

Definition	Example	Sample Elements
<p>Category C:</p> <p>An event directed at an internal or external constituency that requires coordination and planning. Typically low-end events with moderate elements.</p>	<ul style="list-style-type: none"> • Employee recognition events • Docent and volunteer activities • Public receptions following public lectures or programs • Public opening; Family Day • Community events, such as Teachers' Night 	<ul style="list-style-type: none"> • Minimal production costs • Business or casual attire • Variety of food and beverage offerings • Equipment is often disposable • Some lighting and other décor elements • Some audio-visual equipment and staging for remarks and/or entertainment • Invitations and other printed materials (such as place cards or menus) may not be required or may be done by Unit staff

Approval Requirements for Smithsonian Special Events

Approval for Category A Events				
Type of Event	Event Coordinator	Event Funder	Reviewing Official	Authorizing Official
Regents Events	Office of Special Events and Protocol	Office of the Regents	Office of the Chief Financial Officer	Chairman of the Board of Regents
Secretarial Events	Office of Special Events and Protocol	Office of the Secretary	Office of the Chief Financial Officer	Chairman of the Board of Regents or his/her designee
Secretary's Direct Reports Events	Office of Special Events and Protocol	Direct Report	Office of the Chief Financial Officer	Secretary or his/her designee
Unit Events	Unit Special Events Office and/or Office of Special Events and Protocol	Unit Event Host	Unit Director	Appropriate Under Secretary or his/her designee

Approval for Category B and C Events			
Type of Event	Event Coordinator	Event Funder	Authorizing Official
Regents Events	Office of Special Events and Protocol	Office of the Regents	Chairman of the Board of Regents or his/her designee
Secretarial Events	Office of Special Events and Protocol	Office of the Secretary	Secretary or his/her designee
Secretary's Direct Reports Events	Office of Special Events and Protocol	Direct Report	Direct Report or his/her designee
Unit Events	Unit Special Events Office and/or Office of Special Events and Protocol	Unit Event Host	Unit Director or his/her designee

Definitions

For the purposes of these spending guidelines, the following definitions apply:

Constituent. Constituents are defined in these spending guidelines as donors, prospective donors, artists, scientists, scholars, dignitaries, members of Congress, etc.

Event Funder/Event Funding Organization is defined as the Smithsonian organization whose funds will be used to pay the expenses related to an event. This is most often, but not always, also the event host organization.

Lavish Expense. Most dictionaries define “lavish” as characterized by profuse or wasteful expenditure or squandering without limit. The Internal Revenue Code prohibits deductions for lavish business and entertainment expenses. The Code does not define lavish, but relies instead on a facts and circumstances test. Decisions interpreting the Code have provided the following guidance: An expense for entertainment will not be considered lavish or extravagant merely because it involves first-class accommodations or services.

Reasonable Expense. “Reasonable” is defined as governed by or being in accordance with reason and prudence, within the bounds of common sense, and easily supported or justified by fact or circumstance. According to the Internal Revenue Code, an expense which, considering the facts and circumstances, is reasonable and appropriate will not be considered lavish or extravagant.

Representational Expenses are defined as the broadest category of business and business-related entertainment expenses, which are incurred for the purpose of fulfilling courtesy and social responsibilities directly associated with official duties and the Smithsonian’s mission. They may include expenses for meals, travel, gifts, hospitality, and other activities that arise from the Institution’s need to interact with various individuals and organizations outside the Smithsonian.¹ Special Events are a particular type of representational expense, but not all special events are representational. Expenses associated with purely internal Smithsonian events for staff only are not representational expenses, but such events are still deemed special events and require compliance with applicable review and approval policies. Only Special Events are covered by these spending guidelines. Other types of representational expenses (e.g., lunch between a museum director and prospective donor) are addressed by other policy directives and are not covered by these guidelines.

¹ As a general rule, representational expenses are intended to be used for entertainment of outside persons and entities but the Comptroller General has found that this does not mean that internal staff is precluded from attending such events as incident to an authorized entertainment function for outside individuals.

Special Events include a variety of events, such as meetings, conferences, film screenings, lectures, seminars, symposia, artistic performances, exhibition opening receptions, cocktail receptions, seated and buffet dinners, luncheons, public programs, private staff events, and as more fully identified in the Special Event category chart.

SMITHSONIAN ENTERPRISES RETAIL REVENUE SHARING

Introduction	1
Policy	1
Definitions	2
Revenue Share Calculation Guidelines	4
Revenue Share Calculation Methodology	6
Distribution of Revenue Shares to Units	7
Treatment of Full-Year Net Losses	7
Determining Net Gains and Net Losses	8
Retail Activities Not Subject to Revenue Sharing	9
Roles and Responsibilities	10
Treatment of Staff Cafeterias	13
Appendix A, Revenue Shares in Quarters 1–3	
Appendix B, Revenue Share Incentives	
Appendix C, Full-Year Revenue Share Amounts	
Appendix D, Operating Income After Tax Calculations	

Introduction

This directive establishes the Institution's policy for sharing revenues generated by the Smithsonian Enterprises' (SE) retail activities with the unit in which the retail activities are located. It does not address revenue sharing from licensing.

Policy

The Institution relies on a variety of funding sources to finance its mission to increase and diffuse knowledge. These sources include federal appropriations, donor contributions, Government grants, membership income, investments, and other revenue-generating activities such as retail, media, licensing, traveling exhibits, and fee-for-service educational programs. The SE mission is "to engage in successful revenue-generating activities that are compatible with the Smithsonian mission, values, and reputation to support the Institution's scholarship and programs." To accomplish its mission and continually deliver, expand, and improve

Policy (continued)

high-quality products, media content, and visitor services, SE depends on the cooperation of and collaboration with others at the Smithsonian, particularly the unit directors, scholars, curators, and educators.

Revenue sharing is the process by which SE profits from revenue-generating activities are shared with the units. It is also the process that binds the museums and SE together — in partnership — to achieve the shared Smithsonian goal of increasing the Institution's financial resources while striving to offer the public meaningful learning experiences.

The Institution's policy is to share a portion of the revenue generated by SE retail business activities with the units that house these activities in their facilities. After paying the unit revenue share amounts, the balance of the annual SE retail Operating Income After Taxes (OIAT) will pass to the Institution as income for the central trust budget.

Definitions

Four Wall Operation represents the activities, both sales and costs, which are identifiable to a specific unit's operation and are not allocated. Examples of these costs include the personnel costs to staff the store, utility costs, repairs and maintenance, depreciation and costs of merchandise or films. A further description and detail of these costs is listed in Appendix D.

Incentive Increment (when the prior three-year average is an OIAT gain) — the difference between the current year net gain and the increased prior three-year average OIAT gain, as determined by the following formula:

$$\text{Current FY OIAT gain} - (\text{Increased prior three-year average OIAT gain}) = \text{Incentive Increment}$$

Incentive Increment (when the prior three-year average is an OIAT loss) — the difference between the current year OIAT gain/loss and the prior three-year average OIAT loss, as determined by the following formula:

Definitions
(continued)

Current FY OIAT gain/loss – (Prior three-year average OIAT loss) = Incentive Increment

SE Shared Services Activities are those costs that are required to operate the four wall activities but are not identifiable or auditable at the unit location. Examples include: the costs of distribution center costs, buyers who select merchandise for multiple units, accounting processing and control costs that benefit multiple locations and human resource functional oversight, among others. A fuller description and details of these costs are identified in Appendix D.

Unrelated Business Income Tax (UBIT) — Unrelated Business Income Tax (UBIT) is the federal income tax imposed on the net revenue (i.e., revenue less associated expenses) of tax-exempt organizations, including the Smithsonian, which is generated from regular business activities that are regularly carried out and not substantially related to the organization's exempt purpose. The determination of which revenue is subject to UBIT is based on Internal Revenue Service (IRS) regulations and rulings. Examples of Smithsonian retail activities whose revenue is subject to UBIT are museum stores' sales of Washington, DC souvenirs; certain merchandise sold without literature describing its connection to the museum's collections; sales of magazine advertising space; and ticket sales for non-mission movies shown in museum theaters.

Operating Income After Tax (OIAT) — OIAT is the profit of Unit Retail Operations based only on the revenue and costs directly attributable to the "four wall" operations of the particular store, theater, café or amenity. This also includes the UBIT in the case of non-mission-related revenue such as non-mission movies or merchandise sold without Smithsonian Institution (SI) provenance.

Full-Year Revenue Share Earning is accomplished in three steps:

- 1) 35 percent is allocated to the units
- 2) shared services are assessed
- 3) remaining income is allocated to Central Trust.

Definitions
(continued)

Incentive Payment — The revenue shares paid to a unit to recognize improved performance. The incentive payment is equal to 75 percent of the incentive increment, as calculated using the following formula:

$$\text{Incentive Increment} \times 0.75 = \text{Incentive Payment}$$

Increased Prior Three-Year Average OIAT — This is equal to the average OIAT gain from the prior three fiscal years, increased by 5 percent and calculated using the following formula:

$$((\text{FY-3 OIAT} + \text{FY-2 OIAT} + \text{FY-1 OIAT})/3) \times 1.05 = \text{Increased Prior Three-Year Average OIAT gain}$$

Revenue — For SE retail activities: store and theater revenue equals gross sales, less discounts and refunds, plus other income, and food and beverage revenue equals concessions revenue; the calculation of revenue is further described in Appendix D.

Revenue Share Payment — The amount paid to the unit using the retail revenue-sharing calculations which includes the incentive payment and the 35 percent revenue share earnings.

Staff Cafeteria — Those food and beverage (F&B) operations that are located in a Smithsonian facility, not open to the public, and serve food only to SI staff.

**Revenue Share
Calculation
Guidelines**

All current and future retail activities, managed or operated by SE and located within the “four walls” of a unit or on the unit’s exterior grounds, walkways, or plazas will be assigned to the unit for revenue-sharing purposes. This includes vending activities or machines (e.g., soda, snack, beverage, and food vending sales) that are located in the unit.

Some units have multiple locations. The following guidelines will be used for revenue share payment purposes:

**Revenue Share
Calculation
Guidelines**
(continued)

- When a unit operates in multiple locations, and each location includes SE retail activities, the unit will choose how it wants to receive its revenue share payments. The two options are separate payments for each location or a single consolidated revenue share payment.
- The unit is required to select its payment method by October 1st each fiscal year, and to inform the Director, Office of Planning, Management and Budget (OPMB), of this decision in writing. Once a payment method is selected by the unit, it will remain in place for the full fiscal year.
- If one or more of the locations incurs a net loss, this loss will be offset by the unit's other location(s) as part of the revenue share calculation.

If more than one unit is located in a single building and they share retail venues, the unit directors will negotiate how revenue share payments will be divided between the units, as follows:

- Unit directors will provide written notification to SE on the distribution percentages for revenue share payments prior to the start of each fiscal year

For revenue-sharing purposes, the Secretary will designate a Smithsonian official to serve as the Castle Director for all non-unit specific retail activities located in the Castle, its gardens, and the Ripley Center. This official will receive revenue share payments on behalf of the Castle community, with the following exceptions:

- The Castle Food & Beverage activities (e.g., staff deli, Castle Café, exterior carts, and vending activities) are not subject to revenue sharing.
- The income generated by retail activity associated with a temporary exhibit or museum program located in the Castle, its gardens, or on the Quad will be subject to revenue sharing with the museum/SI unit hosting the exhibit or program. An example of this situation was the temporary museum store associated with the Jim Henson's

**Revenue Share
Calculation
Guidelines
(continued)**

Fantastic World exhibit located in the Quad. In this instance, the Smithsonian Institution Traveling Exhibition Service (SITES) received revenue share payments.

All current and future SE retail activities located within the walls of a unit or on the unit's exterior grounds, walkways, or plazas are eligible for revenue sharing.

**Revenue Share
Calculation
Methodology**

All participants in any *revenue share earning* will follow a standardized methodology to calculate and distribute the *revenue share earning*. The SI-approved methodology is as follows:

Step 1 — Calculating Quarter 1, 2, and 3 revenue share payments: Details of the calculations and examples are provided in Appendix A.

Step 2 — Calculating the annual revenue share earnings: Details of the calculations and examples are provided in Appendix B.

Step 1. After the end of quarters 1, 2, and 3, *the 35 percent revenue share payment* due to the unit will be calculated and SE will provide a revenue share payment schedule to the Office of the Comptroller (OC) within 30 days after the end of each quarter, so that OC can transfer revenue share payments to the units. Details on calculating the 35 percent revenue share payments are provided in Appendix A of this directive.

Step 2. At the end of the fiscal year, *the full year revenue share earnings* for each unit will be calculated as follows:

- First, the incentive payment is calculated. Details of calculating the incentive payment are provided in Appendix B.
- Second, the year-to-date (YTD) 35 percent revenue share earnings are calculated. Details on calculating *the full-year revenue share earnings* are provided in Appendix C. They fall under the following guidelines:

**Revenue Share
Calculation
Methodology**
(continued)

- For units that earned an incentive payment, the 35 percent revenue share is equal to 35 percent of the increased prior three-year average net gain after tax
- For units that did not earn an incentive payment, the 35 percent revenue share is equal to 35 percent of the current year OIAT
- Third, the full-year revenue share earnings are determined by adding together the incentive payment and the 35 percent revenue share earnings

Step 3. The final quarter 4 revenue share payment due to the unit is determined. This payment is equal to the difference between the full-year revenue share earnings and the YTD revenue share payments (through the third quarter). The following guidelines apply:

- If this amount is less than zero, it means the unit received revenue share payments (in quarters 1, 2, and 3) in excess of the full-year revenue share earnings.
- In this situation, the unit will retain payments previously provided, and will not be required to repay any amount.

Step 4. SE will provide a final year-end revenue share payment schedule to the OC within 45 days after the end of the fiscal year, and the OC will transfer the net balance of payments owed to each unit.

**Distribution
of Revenue Shares
to Units**

The 35 percent revenue share payments will be distributed to the units on a quarterly basis. However, because the incentive payment cannot be calculated until year end, this payment will be made once per year, as part of the year-end revenue share payment.

**Treatment of Full-
Year Net Losses**

If the cumulative consolidated unit retail position at the end of the fiscal year is an OIAT loss, the central trust budget will absorb the loss, not the unit. The unit will

Treatment of Full-Year Net Losses
(continued)

also retain any 35 percent revenue share payments received in a prior quarter, even when the YTD position is an OIAT loss. Units are also still eligible to receive incentive payments, if retail financial performance is improved over the prior periods. Finally, OIAT losses will not be carried over from one fiscal year into the next fiscal year.

Determining Net Gains and Net Losses

OIAT gains and OIAT losses will be calculated using generally accepted accounting principles, and documented in Profit and Loss (P&L) reports. SE shared service activity costs not directly attributable to a particular unit structure will not be charged against that unit's OIAT. SE must identify costs or projects, as feasible, to a particular unit. Examples of gain/loss calculations are shown in the appendices. The following guidelines apply:

- Depreciation expenses associated with capital investments will be assigned to the location in which the investment was made, and these capitalized costs will be depreciated in full over the useful life of the asset in accordance with standard accounting procedures. In addition:
 - If the activity is taken out of service temporarily during a unit's closure or other "business interruption," depreciation will continue to be reported against the unit, and included in the consolidated OIAT calculation.
 - If the activity is taken out of service permanently before all investments have been depreciated, the remaining asset value will be "written off" as a final operating expense of the unit's retail activity in the shop or food concession.
 - If multiple units pursue a similar project or initiative, direct costs should be identified to the "four wall" expense.
- OIAT gains and OIAT losses are determined after direct operating expenses (salaries and benefits,

**Determining Net
Gains and Net
Losses (continued)**

other operating expenses, and UBIT tax) are deducted.

- Starting in FY 2009, unrelated business income tax (UBIT) payments that are directly linked to merchandise and other retail sales will be treated as an operating expense of the applicable unit retail operation. The 35 percent revenue-share payment will be based on “operating income after tax (OIAT).”

**Retail Activities Not
Subject to Revenue
Sharing**

The following retail activities are not located in a particular unit or there is no direct association with a unit; therefore, the OIAT is not subject to revenue-sharing procedures. The gains or losses generated by these activities will pass through SE into the Institution’s Central Trust budget. These activities consist of:

- Transportation hub stores (current locations are Reagan National Airport, Dulles International Airport, and Union Station)
- Carousel on the National Mall
- The SE-operated food and beverage activities in the Smithsonian Castle, including the Castle Café (public dining operation in the Visitor Center), the Castle deli (staff cafeteria), and the Castle vending operations
- Temporary or permanent SE-operated stores in off-site locations such as shopping malls, train stations, and other tourist or cultural destinations
- Staff cafeteria net losses are not included in revenue share payment calculations. However, if the staff cafeteria ends the year with a net gain, 100 percent of this net gain/loss will be provided to the museum
- All retail divisional shared service costs that are required for the operation of the unit retail stores, theaters, food and beverages, simulators and other amenities (ATMs, penny machines, etc.). These

Retail Activities Not Subject to Revenue Sharing (continued)

include buyers, warehousing, retail management, and ticketing systems.

- All corporate shared service costs that are required for the operation of the unit retail stores, theaters, food and beverages, simulators and other amenities (ATMs and penny machines), etc.). These include the personnel and system costs of accounting, management information systems (MIS), human resources oversight and financial reporting systems.

Roles and Responsibilities

All **Smithsonian retail stakeholders** are responsible for ensuring that interactions are conducted in a spirit of collaboration.

All **Smithsonian retail stakeholders** are responsible for complying with financial internal controls, as described in [SD 310](#), *Financial Reporting and Risk Management Internal Controls*.

The **Director, Office of Planning, Management and Budget** (OPMB), is responsible for:

- establishing, maintaining, and documenting the Institution's retail revenue-sharing methodologies and procedures
- communicating retail revenue-sharing policies and practices to SI directors
- reviewing and validating the revenue share and incentive payment calculations to confirm their accuracy and compliance with this policy
- participating with SE managers and unit directors to collectively review, question, and discuss — on a regular basis — direct and indirect retail business costs and the methodologies used to allocate shared service costs
- ensuring that the 35 percent unit share is appropriate as new projects, costs and strategies or organizational restructuring changes arise

**Roles and
Responsibilities**
(continued)

The ***SE Retail Vice President*** is responsible for collaborating with unit personnel on matters related to continually improving retail activity performance. This requires:

- evaluating and reviewing with the SE, Chief Financial Officer (CFO), and the unit directors, on an annual basis, the status of retail activities that fail to generate fully burdened OIAT, to identify and discuss alternative business models and to address visitor expectations and requirements
- benchmarking the Retail Division costs for 2012 and every three years thereafter in a process acceptable to the SI Under Secretary for Finance and Administration/Chief Financial Officer (USF&A/CFO) and SE President
- reviewing Retail Division costs in detail with the SE President and SI USF&A/CFO on a quarterly basis and annually receiving budget approval on retail divisional overhead
- ensuring that, as new projects, costs and strategy changes arise, OPMB and the SE CFO have the appropriate information to review the treatment of direct four wall costs versus indirect costs in financial results
- ensuring that direct costs are charged appropriately by the retail operations and Retail Finance Manager to accurately state the OIAT by unit

The ***Unit Directors*** are responsible for:

- participating with SE managers to collectively review, question, and discuss direct costs — particularly at SE's annual presentation of its budget for the upcoming fiscal year
- collaborating with SE retail managers on a monthly basis on merchandise selection and presentation, retail operations, and ways to improve gross results,

**Roles and
Responsibilities**
(continued)

and comparing and discussing OIAT business performance against budget

- collaborating with SE to identify mutually acceptable retail venues and to allocate space within their facilities for retail operations
- evaluating and reviewing annually with SE and the SI USF&A/CFO the status of retail activities that fail to generate OIAT, to identify and discuss alternatives, and to address visitor expectations and requirements
- providing suggestions to SE and its Strategic Advisory Committee (SAC) in the development of the retail portion of the multi-year SE Business Plan

The **Smithsonian Comptroller** is responsible for processing revenue sharing transfers in the financial system after receiving revenue share schedule spreadsheets from the SE CFO.

The **SI Under Secretary for Finance and Administration/Chief Financial Officer** is responsible for overseeing the implementation of the retail revenue-sharing policy to ensure its consistent application across the Institution, and for resolving any disputes that arise as a result of this policy implementation.

The **General Counsel** is responsible for advising Smithsonian Enterprises and other SI units on the tax implications, including UBIT, of their revenue-generating activities.

The **SE President**, the **Under Secretary for Finance and Administration/CFO**, the **Under Secretary for History, Art and Culture**, the **Under Secretary for Science**, the **Assistant Secretary for Education and Access**, and the **Deputy Under Secretary for Collections and Interdisciplinary Support** are jointly responsible for approving the revenue-sharing policy, *and* for recommending to the Secretary, for his approval, any required changes or modifications to this policy in the future.

**Treatment of Staff
Cafeterias**

Staff cafeterias are those food and beverage operations that are located in a Smithsonian facility but that are not open to the public. These food operations are provided to promote employee morale and to provide a quick meal option for busy staff. These activities generally operate at a net loss. This directive applies to these activities and operations as follows:

- Staff cafeterias are excluded from the 35 percent revenue share and incentive payment revenue-sharing calculations
- When a staff cafeteria operates at a net loss, the unit in which the cafeteria is located is required to fully subsidize the loss in accordance with a separate Institution-wide agreement. Based on this agreement, the staff cafeterias remain in business only when the operation is profitable or the director of the unit agrees to subsidize all operational losses
- When the staff cafeteria produces a net gain, the unit in which the cafeteria is located will receive 100 percent of the OIAT at year-end.

CANCELLATION:

INQUIRIES:

RETENTION:

SD 324, February 1, 2011

Office of Planning, Management and Budget (OPMB)

Indefinite. Subject to review for currency 24 months from date of issue

April 23, 2013

**CALCULATING THE 35 PERCENT/65 PERCENT REVENUE SHARE
AMOUNTS IN QUARTERS 1, 2, AND 3**

General:

1. Revenue share earnings will be calculated on a year-to-date (YTD) basis at the end of each fiscal year (FY) quarter for the first three quarters.
2. Units will receive revenue share payments when YTD operating income after taxes (OIAT) earnings are greater than YTD payments.
3. The revenue share payment is equal to 35 percent of the YTD OIAT after tax.

Quarter 1 (October + November + December) Calculation Formula:

	If:	Then:
1	If (Q1 OIAT) > \$0	Revenue share earning = 35% of Q1 OIAT
2	If (Q1 OIAT) ≤ \$0	Unit does not earn any revenue share

Quarter 2 (October through March) Calculation Formula:

	If:	Then:
1	If (YTD OIAT) ≤ \$0	Unit does not earn any revenue share
2	If (YTD OIAT) > \$0	Calculate YTD revenue share earnings as follows: (Q1 + Q2 OIAT) x 35% = Revenue share earned October through March
3	If Q1 payment ≥ YTD revenue share earning	Then unit does not earn any revenue share payment this quarter
4	If Q1 payment < YTD revenue share earning	Calculate Q2 revenue share payment as follows: (YTD revenue share earning) – (Q1 revenue share payment) = Amount of revenue share payment due to unit at end of Q2

Quarter 3 (October through June) Calculation Formula:

	If:	Then:
1	If (YTD OIAT) ≤ \$0	Unit does not earn any revenue share
2	If (YTD OIAT) > \$0	Calculate YTD revenue share earnings as follows: (Q1 + Q2 + Q3 OIAT) x 35%
3	If Q1 + Q2 payment ≥ YTD revenue share earning	Then unit does not earn any revenue share payment this quarter
4	If Q1 + Q2 payment < YTD revenue share earning	Calculate Q3 revenue share payment as follows: (YTD revenue share earning) – (Q1 + Q2 revenue share payment) = Amount of revenue share payment due to unit at end of Q3

April 23, 2013

CALCULATING THE REVENUE SHARE INCENTIVE PAYMENT

General

1. The Incentive Payment is calculated once per year, at year end, when the final current year retail operating income after taxes (OIAT) for each unit is available.
2. A unit is eligible to receive an Incentive Payment after it has been open one year, immediately prior to the current fiscal year (FY).
3. The Incentive Payment is earned when one of the following scenarios is met:
 - a. The unit has been open to the public for at least three fiscal years, the Incentive Increment is greater than \$0, and one of the following conditions is met:
 - i. Current year OIAT is better than the increased prior three-year average OIAT
 - ii. Current year produces an OIAT and the prior three-year average was a loss
 - iii. Current year loss is less than the prior three-year average loss
 - b. The unit is in its second fiscal year of operation, the Incentive Increment is greater than \$0, and one of the following conditions is met:
 - i. Current year OIAT exceeds the increased prior year OIAT
 - ii. Current year produces an OIAT and the prior year was a loss
 - iii. Current year loss is less than the prior year loss

General

- c. The unit is in its third fiscal year of operation, the Incentive Increment is greater than \$0, and one of the following conditions is met:
 - i. Current year OIAT is better than the increased prior two-year average OIAT
 - ii. Current year produces an OIAT and the prior two-year average was a loss
 - iii. Current year loss is less than the prior two-year average loss
4. When the prior year OIAT full-year average is a loss, the average loss is used to calculate the incentive payment. The average loss is not increased by 5 percent.

Calculating the Incentive Payments

The following procedures are followed to calculate the Incentive Payment.

	<i>If:</i>	<i>Then:</i>
1	If the current year OIAT and the prior year OIAT average are both > \$0	<p>a. Calculate the Incentive Increment as follows:</p> $\text{Current year OIAT} - (\text{Increased prior three-year average OIAT}) = \text{Incentive Increment}$ <p>b. If the Incentive Increment is > \$0, calculate the Incentive Payment as follows:</p> $\text{Incentive Increment} \times 75\%$ <p>c. If the Incentive Increment is < \$0, the unit does not earn an Incentive Payment</p> <p><i>(Note: If the unit is in its second or third fiscal year of operation, the prior year average OIAT will be based on a shorter time period as described above.)</i></p>

	<i>If:</i>	<i>Then:</i>
2	If the current year OIAT is > \$0 and the prior year OIAT average is < \$0	<p>a. Calculate the Incentive Increment as follows:</p> <p style="padding-left: 40px;">Current year OIAT – (Prior three-year average net loss) = Incentive Increment</p> <p>b. If the Incentive Increment is > \$0, calculate the Incentive Payment as follows:</p> <p style="padding-left: 40px;">Incentive Increment x 75%</p> <p>c. If the Incentive Increment is < \$0, the unit does not earn an Incentive Payment</p> <p><i>(Note: If the unit is in its second or third fiscal year of operation, the prior year average OIAT will be based on a shorter time period as described above.)</i></p>
3	If the current year OIAT and the prior year OIAT average are both < \$0	<p>a. Calculate the Incentive Increment as follows:</p> <p style="padding-left: 40px;">Current year loss – (Prior three-year average loss) = Incentive Increment</p> <p>b. If the Incentive Increment is > \$0, calculate the Incentive Payment as follows:</p> <p style="padding-left: 40px;">Incentive Increment x 75%</p> <p>c. If the Incentive Increment is < \$0, the unit does not earn an Incentive Payment</p> <p><i>(Note: If the unit is in its second or third fiscal year of operation, the prior year average OIAT will be based on a shorter time period as described above.)</i></p>

April 23, 2013

CALCULATING THE FULL-YEAR REVENUE SHARE AMOUNTS IN QUARTER 4

General

1. The full-year revenue share amount is equal to the Incentive Payment plus the 35 percent revenue share earnings.
2. Even though units may have received 35 percent revenue share payments at the end of quarters 1, 2, or 3, the full-year 35 percent revenue share earnings are recalculated at year end, as follows:
 - a. For units that earned an Incentive Payment, the 35 percent revenue share earned will equal 35 percent of the increased prior three-year gain average
 - b. For units that did not earn an Incentive Payment, the 35 percent revenue share earned will equal 35 percent of the current year gain
3. The amount paid to units at year end is equal to the full-year revenue share earned, less payments already received in quarters 1, 2, and 3.
4. If the full-year revenue share earning is less than the year-to-date (YTD) payments, the unit has already received greater revenue share payments than it actually earned for the year. In these situations, the unit will not be required to repay the difference, and the central trust budget will absorb this amount from its share of SE retail gains.

The formulas used to calculate the final Quarter 4 revenue share payment are detailed below.

Step	Activity	Calculation
1	Determine the Incentive Payment	$(\text{Current year OIAT} - (\text{Increased prior three-year average OIAT})) \times 75\% = \text{Incentive Payment for amounts} > \0
2	Calculate the Full-Year 35-65 revenue share earning	<p>a. If Incentive Payment earned in Step 1, then: $(\text{Increased prior three-year OIAT average}) \times 35\% = 35\% \text{ revenue share earning}$</p> <p>b. If Incentive Payment not earned in Step 1, then: $(\text{Current year OIAT}) \times 35\% = 35\% \text{ revenue share earning}$</p>
3	Calculate the Full-Year Revenue Share earning	$\text{Incentive Payment} + 35\% \text{ Revenue Share earning} = \text{Full-Year Revenue Share earning}$
4	Determine amount owed to unit in Quarter 4	<p>$(\text{Total Full-Year Revenue Share earning}) - (\text{Payments already provided to unit in Quarters 1, 2, and 3}) = \text{Amount owed to unit}$</p> <p>If amount owed to unit is $< \\$0$, the unit receives no additional payment in Q4</p>

April 23, 2013

OPERATING INCOME AFTER TAX CALCULATIONS FOR ILLUSTRATIVE PURPOSES

FY13 SE Budgeted Amounts Related to Unit Retail Operations Subject to SD 324 Policy			Stores	Theaters	Sims and Other Amen.	Food & Bev.
<i>Group</i>	<i>Sub Group</i>	<i>SE Account Coding</i>	<i>"X" Represents FY13 Activity Budgeted at Units</i>			
TOTAL REVENUE	GROSS REVENUE	41010 Retail Merchandise	X	X		
		41150 Ticket Sales		X		
		41160 Facility Rental		X		
		41230 Concessions Revenue			X	X
		41235 Beverage Availability Fees				X
		41241 Simulators Revenue			X	
		43140 Partnership Contribution Fee				X
		GROSS REVENUE	X	X	X	X
	DISCOUNTS	42010 Sales Returns/Refunds	X			
		42020 Associate Discounts	X			
		42030 Employee Discounts	X			
		DISCOUNTS				
	NET REVENUE					
	OTHER REVENUE	41170 Membership Income	X	X		

Smithsonian Directive 324, Appendix D,
4/23/13

		41250 Other Revenue from Services Pr		X		
		43010 Sale of Postage	X			
		43170 Miscellaneous Other Revenue			X	X
		43176 Visitors Guides Revenue	X	X		
		OTHER REVENUE				
	OTHER REVENUE					
	TOTAL REVENUE					
TOTAL EXPENSES	COST OF GOODS SOLD	45010 Purchases for Resale	X	X		
		45070 Inventory Shrinkage	X			
		45080 Inventory Writedown	X			
		45141 Vendor Credit Memos		X		
		45190 Royalty Expense		X		
		45191 System Royalties (IMAX)		X		
		45200 Film Cost		X		
		COST OF GOODS SOLD				
	COST OF GOODS SOLD					
	SALARIES	50100 Salaries - Regular	X	X		
		50110 Salaries - Part time	X	X		
		50120 Salaries - Intermittent	X	X		
		50140 Premium Pay	X	X		
		50210 Cash Awards	X	X		
		50211 Membership Commissions	X	X		
		50230 Incentives	X	X		
		SALARIES				
	BENEFITS	50510 Pool Benefits	X	X		
		BENEFITS				
	TRAINING	51010 Training	X	X		

Smithsonian Directive 324, Appendix D,
4/23/13

	TRAINING					
TRAVEL	51100 Travel Transportation-Domestic	X				
	TRAVEL	4				
RENTALS	52010 Rental of Real Property	X				
	RENTALS					
REPAIRS & MAINTENANCE	53010 Equipment Maintenance	X	X			X
	53020 Facility Maintenance	X				
	53030 Materials and Parts	X	X			
	REPAIRS & MAINTENANCE					
UTILITIES	54040 Office Telephone	X				
	54050 Cellular Telephone	X	X			
	54080 Other Utilities	X	X			X
	UTILITIES					
SERVICES	55020 Postage	X				
	55061 Audio/Visual Services	X				
	55070 Other Professional Fees	X	X			
	55075 Pest Control Services	X	X			X
	55090 Guard Service	X	X	X		X
	55100 Custodial Service	X	X	X		X
	55120 Insurance					X
	55140 Armored Courier Service	X	X			
	55160 Management Fees	X				X
	55190 Miscellaneous Service	X				
	55210 Freight Out - Fedx	X				
	SERVICES					
SUPPLIES	56010 Office Supplies	X	X			
	56100 Other Supplies	X	X			

Smithsonian Directive 324, Appendix D,
4/23/13

	SUPPLIES				
SALES EXPENSE	57040 Charge Card Services	X	X		
	SALES EXPENSE				
PROPERTY & EQUIPMENT	58010 Furniture & Fixtures	X	X		X
	58030 ADP and Telecommunications	X			
	58041 Computer Equipment	X			
	58050 Other Equipment		X		
	PROPERTY & EQUIPMENT				2
DEPRECIATION / AMORTIZATION	58015 Depreciation - Equip/SW	X	X		X
	58025 Depreciation - Building/LH	X	X	X	X
	DEPRECIATION / AMORTIZATION				
MARKETING	68130 Other Marketing	X			
	MARKETING				
ALLOCATED DIRECT EXPENSES	71012 Allocation - Stores POS	X			
	ALLOCATED DIRECT EXPENSES				
TOTAL OPERATING EXPENSES					
Tax	89999 UBIT	X	X		
Four Wall Operation or OIAT Is Subtotal of Above Revenues and Costs — Subject to Revenue Share Formula in SD 324					
RETAIL DIVISIONAL ALLOCATIONS	70000 Allocation - Unit			X	X
	70006 Allocation - Retail Mgt.	X	X	X	X
	70007 Allocation - COO Retail	X	X	X	X
	70009 Allocation - Theaters G&A		X		
	71001 Allocation - Stores Op Mgmt	X			

Smithsonian Directive 324, Appendix D,
4/23/13

	71003 Allocation - Stores DCF	X			
	71004 Allocation - Stores Finance	X			
	71005 Allocation - Stores Buyers	X			
	71006 Allocation - Stores Vis Pres.	X			
	71007 Allocation - Museum Relations	X			
	71009 Allocation - Theater Tkt Serv.		X		
	71010 Allocation - Theater Director		X		
	71011 Allocation - Theater Marketing		X		
	71019 Allocation - Thtr,F&B,Conc Mgt		X	X	X
	71021 Allocation - Theater POS Ops		X		
	RETAIL DIVISIONAL ALLOCATIONS				
CORPORATE SHARED SERVICES ALLOCATIONS	70001 Allocation - HR Corp	X	X		
	70003 Allocation - MIS	X	X		
	70004 Allocation - Accounting	X	X	X	X
	71013 Allocation - Reporting Systems	X	X	X	X
	CORP. SHARED SERVICES ALLOCATIONS				
Shared Service Activity — Borne by Central Trust Not Allocated to Unit					

Net Gain Calculation Methodology for Theaters

**SD-401 IMPLEMENTATION HANDBOOK
FOR USE OF FACILITIES
FOR SPECIAL EVENTS AND PUBLIC PROGRAMS**

I. Scope	1
II. Introduction	1
III. Principles	2
IV. Definitions	4
V. Special Events and Public Programs	5
VI. Authority	8
VII. Special Events Policy Committee	9
VIII. Office of Special Events and Protocol	11
IX. Events Planning	14
X. Donations and Other Payments	24
XI. Cancellations	29
XII. General Conditions, Limitations and Regulations	29
XIII. Procedures	33
Attachments	x

I. Scope The policies and procedures contained in this SD pertain to any occasion involving the use of Smithsonian Institution property or facilities that includes the targeted publics and/or Smithsonian staff, volunteers, associates. The phrase "Special Events and public programs" includes a variety of Events, such as meetings, conferences, film screenings, lectures, seminars, symposia, artistic performances, exhibition opening receptions, cocktail receptions, seated and buffet dinners, luncheons, etc., and will hereafter be referred to as "Special Event(s)."

II. Introduction The primary rationale for holding Special Events in Smithsonian facilities is to further the Institution's mission by increasing public familiarity with and appreciation of Smithsonian collections and research and to recognize, cultivate, and steward donors.

Museums and research centers are responsible for developing their own policies and procedures for Special Events, which are consistent with this directive and subject to the approval of the Special Events Policy Committee.

This document presents the Smithsonian Institution's principles, policies and procedures for Special Events. This directive does not represent a radical departure from previous policy (established March 9, 1995), rather it serves to strengthen and clarify the overarching guidelines for the Institution, by which individual units may revise and implement their own sets of procedures.

While procedures for Special Events have been consolidated into a separate Implementation Handbook section of this document, they should be considered policy as well. In addition to the policies and procedures outlined herein, this document also contains an edited version (SD-401-A) for distribution to non-Smithsonian organizations hosting Events at Smithsonian facilities.

All matters relating to Special Events and Public Programs at the Smithsonian are governed by the SD-401 and its Implementation Handbook. In any matters pertaining to Special Events, other Smithsonian Directives may be more restrictive than SD-401 regarding Special Events however; they may not be more permissive.

III. Principles

The Smithsonian Institution, as a Trust instrumentality of the Federal government and on behalf of the American people, seeks in all its activities to fulfill its mission, "the increase and diffusion of knowledge."

Through Special Events, as defined below, the Smithsonian exposes constituencies to the work of the Institution and derives support for that work. Special Events are an integral part of Smithsonian marketing, development, and fund-raising. Special Events also afford the Smithsonian the opportunity to reach out to new audiences to increase the relevance of its work to all segments of American society.

The Smithsonian is first and foremost a highly regarded knowledge-based complex of museums, research centers, and major programs and its reputation and

integrity must be primary in the planning if any Special Event. While there exists a need by the Institution to raise an increasing portion of its funding through Special Events, individual units should put the good name of the Institution and the viability of its brand above revenue from any single Event.

The Smithsonian Institution has some of the most unique and beautiful Special Events venues in the world. These prestigious venues provide limitless opportunities for the Institution to present itself, to nurture already existing relationships, to cultivate new relationships and to target new audiences. The Smithsonian Institution is widely recognized as a highly-regarded global brand; and Special Events planning must ensure that the reputation and image of the Smithsonian Institution are not only protected but enhanced through the use of Smithsonian facilities for Special Events.

The collections and research activities of the Smithsonian make Smithsonian venues unique. The uniqueness of the Smithsonian venues requires that those who use Smithsonian facilities must make certain unique accommodations to the Smithsonian as a condition of using the facilities. For example, 1) the Senior-most ranking Smithsonian official (such as Deputy/Under Secretary) in attendance will make remarks if there is a speaking program, in addition to any museum/unit director scheduled to speak; and 2) the Smithsonian reserves the right to add names to the invitation lists, including Members of Congress, as appropriate.

While all space at the Institution is “Smithsonian” space, not all venues are equal in their capacity and usefulness for Special Event purposes. Recognizing, as well, that each museum, research center, and major program has its own special mix of collections, cultural significance, constituencies, and traditions, this statement of principles and policies for Special Events represents what makes sense for the whole while allowing for variations for the parts.

The Smithsonian practices non-discriminatory policies and procedures in all of its programs and activities, and this undergirds its open approach to Special Event planning in every aspect, including guest list development, the selection of vendors, and the like. No facet of Special Events planning policies and procedures

may undermine the Institution's commitment to equal opportunity.

As a vast complex of museums, research centers, and major programs, the Smithsonian is regarded widely as the sum of these parts. Many of the Smithsonian's major programs do not have a dedicated "home-base" facility, but must utilize museum and research center space to fulfill their missions. Accordingly, Smithsonian facilities must be made available for use by all Smithsonian units in order for all parts of the Smithsonian mission to be fulfilled.

Therefore, while the responsibility for management of Smithsonian facilities operations is delegated to the directors of the Institution's museums and research centers, oversight of all space within the Institution must be conducted in accordance with the overarching principles and policies established herein and to the benefit of the Smithsonian's shared mission.

This policy includes programming co-sponsored by an outside organization and held in Smithsonian auditoria.

IV. Definitions

Special Events or Events is used throughout this document to include any Event and/or public program using Smithsonian Institution property or facilities that includes a targeted audience/public and/or Smithsonian staff, volunteers, associates.

Sponsoring Office is used throughout this document to indicate the Smithsonian museum, research center or office that sponsors or proposes to sponsor an Event, or co-sponsors or proposes to co-sponsor an Event with an outside organization, regardless of the facility in which it is held.

Host Facility is used throughout this document to indicate the Smithsonian facility where the Event is being held regardless of the sponsoring office.

Authorizing Official is used throughout this document to indicate the official responsible for granting the approval to hold an Event. In the majority of instances, that official is the building director of the host facility, or designee, within which the Event is to be held.

Event Coordinator is used throughout this document to indicate the individual responsible for the logistics and protocol of the Event. There are two types of Event coordinators: the Sponsoring Office Event Coordinator and the Host Facility Event Coordinator. Their responsibilities are delineated in Section VIII of this Directive. The division of responsibilities between the two coordinators may vary from Event to Event as agreed upon by those coordinators and the sponsoring office.

Deputy/Under Secretary, is used throughout this document to indicate the appropriate Smithsonian Institution Deputy Secretary, Under Secretary, or the Senior manager who reports directly to the Secretary.

Outside Organization is used throughout this document to indicate an external (non-Smithsonian) incorporated or unincorporated entity or organization that is co-sponsoring an Event with a Sponsoring Office.

V. Special Events and Public Programs

- A. Purpose.** The primary purpose for any Event at the Smithsonian is to advance the mission of the Institution, and the purpose of a Special Event is to share the resources of the Smithsonian with a targeted audience to promote the sciences, arts and humanities.

The goal of each Event must involve at least one of the following:

- to serve the Smithsonian's broad educational mandate and its range of programs and activities, and to widen associates' and the public's understanding of the Institution.
- to advance the Institution's mandate for education and the diffusion of knowledge through a broad range of programs and activities.
- to attract new audiences to the Smithsonian, including those who have been traditionally under-represented and under-served.
- to recognize donors, and to cultivate potential donors and collectors.

B. Types of Events. Use of Smithsonian facilities may be authorized for the following types of official Events. All Events are subject to staff resources, space availability, and timing, as defined by the authorizing official/designee responsible for the space requested.

1. Smithsonian-sponsored Special Events which present Smithsonian activities to the general public, such as educational programs, symposia, workshops, lectures, films and, on occasion, public exhibition openings. These occasions may or may not include breakfasts, luncheons, dinners, or receptions as part of the program.
2. Smithsonian-sponsored Special Events initiated by the Secretary, Deputy Secretary or Under Secretary, such as meetings and related Events of the Board of Regents, the Smithsonian National Board, the Smithsonian Council, and other Institutional bodies.
3. Special Events initiated by a Smithsonian Museum, Research Center or Office to be used primarily as development/membership/cultivation opportunities, including board meetings/dinners of outside organizations and foundations, Smithsonian Corporate Membership Events, Contributing Membership Events, Smithsonian Magazine Events, etc.
4. Smithsonian co-sponsored Special Events, generally initiated by an outside organization in keeping with the mission of the Smithsonian and these guidelines or as a benefit of Smithsonian Corporate Membership. Such Events may involve the recognition of a donation to the Smithsonian. The main audience for these Events usually will be affiliated with the outside organization, which is expected to underwrite the total costs of the Event.

All Events held in Smithsonian facilities with an outside organization must be co-sponsored by a Sponsoring Office. Co-sponsorship means that senior officials of the Sponsoring Unit must participate in the Event.

5. Public programs or conferences, generally initiated by a non-profit/non partisan organization or foundation involved in research, development, production,

information dissemination, or educational activities related to the Smithsonian Institution and its collections. The primary purpose of such Events is to present the Smithsonian's work or activities to the outside organization's members and invited guests, and in some instances, the general public. This relationship may involve full or partial underwriting of the Event by the outside organization. Senior officials of the Sponsoring Office must participate.

6. Smithsonian-sponsored, invitation-only Events such as exhibition opening receptions and dinners. Such Events may involve a corporate/foundation co-sponsor(s).
7. Annual Events/programs initiated by a Smithsonian museum, research center or office.
8. Internal Events that are organized and attended primarily by Smithsonian staff and volunteers, such as award ceremonies, conferences, staff film screenings, advisory board meetings, and other official Events such as official farewell parties and holiday celebrations.
9. Official Presidential Inaugural Activities
10. Individual Host Facility policies may permit Federal agencies to hold Events unrelated to the Host Facility's activities at the discretion of the director and within the Host Facility's established guidelines. It is expected that those Federal agencies will pay direct costs and administrative fees for the use of the facilities, and that all aspects of this policy will be in effect.

C. Unacceptable types of Events and activities. The use of Smithsonian facilities will not be authorized for Events with an outside organization, whether or not co-sponsorship is sought or whether the Event falls within a category of Event as described in Section V.B above, when:

1. The primary purpose of the Event is social, such as weddings, birthdays, etc.
2. The Event is partisan, political, or religious in nature;
3. The Event --
 - includes fund raising or cause-related marketing other than for the Smithsonian Institution

- includes a product promotion
- benefits, predominantly or exclusively, the outside organization.

No Special Events may:

1. charge admission fees, other than conference registration fees for conferences co-sponsored by the Institution;
2. collect donations or hold raffles;
3. violate any federal or local law regarding the sale of alcoholic beverages or other restricted substances;
4. display or promote commercial products or sell articles in any Smithsonian facility, with the exception of those Events conducted by The Smithsonian Associates, FONZ, and the Renwick Alliance or sales of merchandise by Smithsonian Museum Shops.

While Federal agencies may utilize Smithsonian facilities, no Events will be permitted which announce, promote, advocate or otherwise deal with policy initiatives other than those that are specifically Smithsonian-related.

Consistent with applicable Federal laws and Smithsonian directives and policies, Smithsonian facilities shall not be made available to any organization that practices or advocates discrimination based on age, sex, color, religion, national origin, or condition of handicap.

Under exceptional circumstances, the Secretary, the Deputy Secretary, or the Under Secretary may waive these restrictions. The Sponsoring Office must direct all requests for waivers through the Special Events Policy Committee.

VI. Authority

A. Authorizing officials.

1. **Smithsonian-sponsored and internal Events.**

Officials authorized to approve the use of facilities for Smithsonian Events are a) the Executive Assistant to the Secretary for the Smithsonian Institution Building, the Arts and Industries Building, and the Enid Haupt Garden; and b) the building directors for areas under their jurisdiction.

2. **Co-sponsored Events.** Officials authorized to approve the use of facilities for co-sponsored Events are a) the Executive Assistant to the Secretary for the

Smithsonian Institution Building, the Arts and Industries Building, the Enid Haupt Garden and the S. Dillon Ripley Center; and b) the building directors for areas under their jurisdiction.

Authorizing officials may approve an Event co-sponsored with an outside organization in cases where there is a clear and direct connection between the organization, the purposes of the Event, and the Smithsonian's aims and interests. Such Events include those where a primary purpose is to recognize a major gift, exhibition openings, and programs, lectures, or other activities made possible by outside funding.

For Events co-sponsored with an outside organization, the Sponsoring Office wishing to co-sponsor the Event must evaluate the acceptability of the proposed Event, in consultation with the authorizing official concerned, BEFORE making any commitment to the outside organization and prior to the submission of the Event scheduling form (SI-600). (See Section IX, B – Events Planning.; and Section XIII, A, 1 – Procedures.)

If an authorizing official or a Sponsoring Office has a question regarding the acceptability of an Event, the authorizing official should seek the guidance of the Special Events Policy Committee prior to making any commitment. (See Section VII – Special Events Policy Committee.)

- B. Approval Process.** See headings under Section IX – Events Planning; and Section XIII, Procedures, of these guidelines for procedural steps involved in the approval of a Special Event.

VII. Special Events Policy Committee

- A. Purpose.** The Special Events Policy Committee was established to:
- oversee the use of Smithsonian facilities for Special Events as prescribed herein, and to make decisions on the use of space based on the best interests of the Institution
 - provide advice on policy issues that may arise

- review unit and office Special Events policies for consistency with this SD
- consider potential interference with visitor access during normal hours of operation
- receive requests for waivers of these guidelines and recommend action to the Secretary and Deputy/Under Secretary
- be responsible for the receipt and initial review of proposed co-sponsored Events requiring the Committee's attention. Difficult requests will go to the Special Events Policy Committee through the Assistant to the Deputy/Under Secretary to whom the unit or office reports.

B. Composition. The Special Events Policy Committee consists of the following members:

- Executive Assistant to the Secretary, Chair
- Director, Office of Special Events and Protocol (OSEP), Vice Chair
- Designated Representative of the Deputy Secretary
- Designated Representative of the Under Secretary for Science
- Designated Representative of the Under Secretary for Art
- Designated Unit Special Events Coordinator, on a two-year rotating basis
- and of counsel:
 - General Counsel (or designee)
 - Director, Office of Development (or designee)
 - Director, Office of Government Relations (or designee)
 - Director, Office of Communications (or designee)
 - Director, Office of Facilities Engineering and Operations (or designee)
 - Representative of internal co-sponsor of the Event under discussion

C. Written Policies and Accountability. Each museum Director is responsible for establishing a written policy governing Special Events held on its premises and is accountable for the results to his or her Deputy/Under Secretary. Such policies and guidelines must be consistent with the provisions of this SD. Each policy must be reviewed and approved by the Special Events Policy Committee for its consistency with these provisions prior to issuance.

The guidelines for each museum and unit must assign accountability and responsibility at each stage of the Special Events planning, coordinating, and executing process. Further, the guidelines for each museum must state clearly policies, procedures and standards for Special Events planning, coordinating, and executing and outline mechanisms for the review and approval of documents emerging from these processes.

The roles and responsibilities of key Smithsonian participants in the Special Events planning, coordinating, and executing processes must be established as part of the guidelines for each unit. The units' guidelines should clearly identify Smithsonian participants who have authority and accountability for the review and approval of Special Events purposes and procedures, and all participants should be provided copies of the guidelines.

The Secretary of the Smithsonian Institution has final authority to approve or disapprove any Special Event held on Smithsonian property, at his discretion, at any stage of the process.

VIII. Office of Special Events and Protocol

A. Purpose. The Event Coordinator has primary responsibility for Event preparation and execution. The Office of Special Events and Protocol (OSEP) primarily supports Events and conferences for the Board of Regents, central Smithsonian administration, and pan-Institutional offices and programs which lack the resources to execute Events and conferences. OSEP is also available to support Events involving the use of the Smithsonian Institution Building, the Arts and Industries Building, the Enid Haupt Garden, the Ripley Center, and other facilities as requested. The extent of support by OSEP to Event Coordinators throughout the Institution, whether through personnel or otherwise, shall be subject to OSEP guidelines and determined by consultation between the Event Coordinator and the Director of OSEP.

B. The Office of Special Events and Protocol:

- Coordinates approval process of Special Events requiring Special Events Policy Committee attention and approval (with appropriate

- Maintains the Institution-wide Master Special Events Calendar (See Section IX, D – Scheduling)
- Records all tentatively approved Events on the Master Calendar, and keeps a record of all Special Events, whether approved or disapproved
- Supports approved Events as assigned
- Reviews Event details and logistics, coordinates approval of seating arrangements, coordinates approval of invitation copy, and prepares all executive briefing materials for the Secretary, Deputy Secretary and Under Secretaries for any Events in which they are to participate. Provides on-site advance staffing for senior management as requested
- The Director of Protocol, OSEP, serves as the Smithsonian's chief protocol officer, and, in collaboration with the Office of Government Relations and the Office of International Relations, oversees all logistics for hosting visiting dignitaries, heads of state, executive branch and other high-level visitors to ensure that logistical arrangements are executed properly and that proper protocol is observed
- Serves as the central point of contact for all dignitaries' advance staffs, and provides on-site OSEP advance staff to serve as escorts for dignitaries, and to coordinate protocol and visit logistics
- Serves as a central resource for the Institution on all matters relating to Special Events, Events policies and procedures, and protocol
- Maintains a non-exclusive list of caterers and current certificates of insurance

C. Smithsonian Event Coordinators. Event Coordinators (both OSEP and unit coordinators) are integral partners in all phases of the Event process, as well as a resource for assistance. The designated Event Coordinator has final approval over all aspects of the Event, and works directly with a single point of contact from the outside organization or its agent throughout the Event planning and execution. Sponsoring Office Event Coordinators and Host Facility Event Coordinators will work together to determine delineation of Event responsibilities.

Event Coordinators:

Place date(s) and times on Smithsonian Master Calendar in OSEP

- Prepare written letter of agreement and any other necessary forms
- Ensure that the form SI-600 is prepared and signed
- Issue necessary requests for services of Smithsonian support units and other instructions
- Coordinate, arrange, and supervise completion of all Event requirements, including selection and/or approval of caterer, music/entertainment, protocol, speaking program, décor, special effects, docent participation, walk-throughs, and on-site direction of all other aspects of the Event
- Prepare an Event memo for distribution
- Hold walk-through of facility with outside co-sponsor and vendors
- Ensure attendance and participation by ranking officials of the Smithsonian and Sponsoring Office
- Develop/obtain the guest list for Event and inform appropriate Smithsonian offices with an interest in a particular group or Event including the Offices of Government Relations, Development, Communications and Public Affairs
- Request and approve design, style and text of all printed materials related to the Event, including invitations, programs, web pages, handouts, etc.
- Obtain appropriate review and final approval of publicity or other promotional plans, advertising materials, visual presentations, press and broadcast media coverage; requests for videotaping, photography, recording, banners; requests for use of logos or trademarks; and any other matters related to the use of the Smithsonian name and image, etc. (See SD-805.)
- Maintain contact with the outside organization, the Host Facility Event Coordinator, Smithsonian support units, and OSEP, as needed
- Obtain written approval from the outside organization for any substantive changes to the original agreement
- Ensure that funds or transfers for internal Events are authorized and available
- Ensure preparation of invoice for and collect funds from the outside organization; distribute these funds to appropriate support offices

- Request that the caterer distribute leftover food
- Host Facility Event Coordinator has the ultimate responsibility for the logistics of the Event in that facility. If the Sponsoring Office is not the Host Facility, the Host Facility Event Coordinator acts as the principal liaison for the facility and works closely with the OSEP coordinator or sponsoring office coordinator to ensure that all regulations, requirements and standards have been met.

IX. Events Planning

- A. Responsibilities of being an Event co-sponsor.** A Sponsoring Office, in agreeing to co-sponsor an Event with an outside organization, must understand that it is fully responsible for ensuring that all aspects of the Special Event are fully compliant with Smithsonian policies and practices.

The Sponsoring Office is ultimately responsible for reimbursing Smithsonian support units for costs incurred, and will be held financially accountable if the outside organization fails to make timely payments for direct costs incurred as a result of the Event. (See Sections X – Donations and Other Payments; and XIII, F – Procedures; Payment.)

The Sponsoring Office Event Coordinator is responsible for preparing and distributing a Written Letter of Agreement for Co-sponsored Events (See Section XIII, C – Written Agreement.)

A designated staff member(s) or representative of the Sponsoring Office, in addition to the Sponsoring Office Event coordinator, must be present at the Event.

The Sponsoring Office Event Coordinator involved will be expected to consult with the outside organization on every phase of the Event, including the program, invitation list, publicity, funding, and arrangements for space preparation, staff support, and other services, and shall have the final approval and ultimate responsibility for all aspects of the Event, including appropriate review of publicity and other promotional plans of the outside organization. The Smithsonian's approval of arrangements shall apply in the same manner when

public relations firms or other agents represent the outside organization.

B. Approval of Events. Proposed Special Events must be discussed early in the planning process with senior staff of the museum or other units as well, and for those that might be considered sensitive, with the Deputy/Under Secretary, (and the Director of Special Events and Protocol, Director of Communications and Public Affairs and the Director of Government Relations, as necessary).

Sensitive Issues:

- For each Special Event, museums and relevant staff need to identify the Event's intended audience and those audiences who may have concerns about the Event's topic or co-sponsor.
- Museums and relevant staff, in concert with the Deputy/Under Secretary, must establish mechanisms to identify potentially sensitive issues. Museums and exhibiting units should address these issues by carefully reviewing the topic of the Event or the co-sponsor.
- When sensitive issues arise, the Sponsoring Office Event Coordinator will notify the responsible unit Director, who will determine, in accordance with established policies, whether to proceed with planning, or as the situation shall warrant, whether to seek the necessary authorization to proceed with planning.

C. Application for facilities for Special Events (Form SI-600). The form SI-600 is designed to provide for the request and approval of space for a Special Event and to provide for the preliminary preparation and execution of Special Events once approved. An example of the form SI-600 is provided in Appendix B. It is the responsibility of the Authorizing Official to ensure that the SI-600 contains sufficient information to evaluate the appropriateness of the Event. The SI-600 for, and any other paperwork, must be submitted within a time frame established by the Host Facility Event Coordinator (or OSEP coordinator when applicable), taking into consideration the scope and complexity of the Event.

The authorizing official or designee approves the Event and completes Part IV of the SI-600 form. For all Special Events, the authorizing official will give approval within seven (7) working days unless the authorizing official is notified in the interim by other SI-600 recipients of any special circumstances. The Authorizing Official, or designee, must sign the SI-600, indicating the approval of the Event and ensuring standardization on the approval process before committing resources to support Events.

D. Scheduling. Sound scheduling practices are critical in all stages of Special Events planning. The existence of potentially competing Special Events must be taken into account from the outset of planning.

1. Use of Space by Smithsonian Units and Programs.

Because Special Events play an increasingly critical role in units' abilities to fulfill all aspects of the Smithsonian mission (including but not limited to donor cultivation, educational programming and public impact), the demand for Smithsonian facilities is increasing. Smithsonian units without a "home base" facility (i.e., central and programmatic units, such as SCEMS, SLC, SI Libraries, TSA, et. al.) significantly outnumber the available museum and research center facilities, so Special Event scheduling has become highly competitive. All Smithsonian facilities must be made reasonably available to all Smithsonian units for Special Events, and Special Events scheduling must strike a balance between the revenue goals and the educational and public impact missions of the Smithsonian. Potential Host Facilities must make their facilities reasonably available at any time during the year unless there is an approved Event scheduled for the same time. Events should be distributed reasonably across host units so that no single host unit bears an inordinate share of Special Events sponsored or co-sponsored by Smithsonian units without facilities.

All units must remain flexible, therefore, and willing to negotiate and compromise in scheduling the use of Smithsonian facilities for Special Events.

High-volume users, (such as TSA, SBV, etc.) should submit an annual plan to each Host Facility with a projected (to the degree possible) number of Events to be hosted in that facility to enable all parties to plan

appropriately. Changes to this plan may be negotiated based on availability.

To protect the collections and individual facilities, and because all Special Events ultimately reflect on the Host Facility, all facility users must adhere to the standards for Events set within each of the facilities' individual policies, such as minimum number of drop tables, trash cans, etc.

No museum may arbitrarily and unilaterally refuse to host an Event for another Smithsonian organization.

2. Master Special Events Calendar. The Office of Special Events and Protocol maintains a monthly master (Institution-wide) calendar of all invitational Special Events at the Smithsonian.

To avoid and/or minimize conflicts in scheduling, all Events must be entered on this Master Special Events Calendar.

Sponsoring Office Event Coordinators must clear dates for high level/high visibility Events with OSEP before submitting the SI-600, and must notify OSEP immediately when any change in date, time, or place of a scheduled Event is made.

3. Resolution of Scheduling Conflicts. When two or more Special Events are scheduled for the same time and date, the Director of OSEP will attempt to minimize such conflicts through discussion/negotiation with the appropriate sponsoring offices and/or Event coordinators. This is especially important when the same constituents and/or participants (e.g., Smithsonian officials, Members of Congress, the media, et. al.) would be invited to two Events on the same date. In some cases, the Event date will need to be changed, particularly if the Event involves high level officials of the Smithsonian and others in the community.

If initial attempts at negotiation fail to ameliorate the scheduling conflict, the Director of OSEP will consult with the Special Events Policy Committee and/or the appropriate Deputy/Under Secretary. The Deputy/Under Secretary ultimately has final authority in conflict resolution.

4. Events involving Members of the Executive Branch or Members of Congress. The Office of Government Relations and the Office of Special Events and Protocol must be notified immediately, prior to the issuance of an invitation, if Members of the Executive Branch or Members of Congress are to be invited to a Special Event.

E. Written agreement for co-sponsored Events. Each Sponsoring Office must have a written letter of agreement with the outside organization which outlines all components of the Event. This letter will confirm the Event date, the donation involved (if applicable), and other financial obligations of the donor or organization, as well as an overview of the program components, number of guests expected, and Event scenario. (See Sample in Appendix C or consult with OGC for unusual circumstances.) See Section XIII, C for specific directions, and Appendix C for a sample letter.

F. Designation of Event coordinators. All Special Events must have a Sponsoring Office Events Coordinator assigned. Authorizing Officials will assign an experienced Host Facility Event coordinator for each Special Event in their building, who will serve as the authorizing official's representative for each Special Event.

If the sponsoring office of an Event is other than an office of the Host Facility, then the Sponsoring Office must assign an experienced Event Coordinator from their office for each Special Event who will serve as the Sponsoring Office's representative. If that office does not have its own Special Events staff, the office must consult with OSEP and the Host Facility before designating an Event Coordinator.

G. Smithsonian support services. Procedures governing the request, availability, and use of Smithsonian support services for Special Events are outlined in Section XIII, D of this Implementation Handbook.

- To enable requesting offices to develop complete budgets for an Event, Smithsonian Support Services Offices (such as Office of Protection Services, Office of Facilities Services, Horticulture Services, Photographic Services, Audio/Visual Services, et.al.) must supply the sponsoring office with a cost estimate

for the requested services within three (3) working days of receipt of the appropriate SI request form.

- To enable sponsoring offices to close out Events and issue final bills to outside organizations, Smithsonian Support Services Offices must provide final invoices to the sponsoring office within ten (10) days after the actual Event date.

H. Approval of Event-related materials and elements.

Invitations. For Special Events with invitations issued in the name of the Board of Regents, Secretary, Deputy Secretary and/or Under Secretaries as the host or co-host of an Event, invitation copy must be sent to OSEP for review and Secretarial approval before printing or mailing.

Printed Materials. Prior to printing, outside organizations must submit any and all printed materials (such as invitations, programs, press releases, etc.) to the Sponsoring Office Event Coordinator for review and approval.

Use of Smithsonian Name, Seal, Logo or Image. The Smithsonian name, seal, logo or image may not be used in any document or website without prior review and approval by the Smithsonian.

Films. If an outside organization wishes to screen a video/film as an element of a Special Event, the video/film must be submitted to the Office of Communications and Public Affairs in advance of the Special Event for review and approval by the Smithsonian.

Speakers and Performers for Co-sponsored Events. The choice of topics, speakers, or performers at co-sponsored Events must be approved by the Sponsoring Office. The program and/or topic must be secular, non-partisan, and non-political. In order to confirm compliance with this requirement, each speaker's name and topic must be submitted in writing to the appropriate Sponsoring Office Events Coordinator at least six (6) weeks in advance of the Event for final approval. Once approved, the Institution will not attempt to alter or influence the content of the speech/performance. The

Smithsonian representative will open all speaking programs.

- I. Invitation Format.** For all Events co-sponsored with an outside organization, the Smithsonian shall be listed as a co-inviter on invitations. There is a strict protocol for all invitations using the Smithsonian name, image or logo. The Smithsonian inviter will appear first, followed by the inviter from the outside organization. Typically names are not used, rather the title of the co-inviter is used (e.g., “The Secretary of the Smithsonian Institution”, “The President of the XYZ Corporation.”) The Smithsonian will approve all invitations prior to printing.

Invitations are a key public exposure vehicle and are important for the Smithsonian because they reach a wide audience that includes not only the general public but also powerful opinion formers and leaders. Invitations provide an opportunity to bring the visual identity of the Smithsonian Institution, and thus its many activities, to key individuals around the country, in communities, in business and in government.

- J. Use of Logos and/or Corporate Identity Images.** All use of logos and/or corporate identity images in Event-related materials and décor must be approved in advance by the Smithsonian. Whether corporate logos will appear in a Smithsonian Host Facility at all is within the discretion of the director of the Host Facility. Any use of corporate logos in Event-related materials and décor must be judicious in order to ensure that the Smithsonian brand is not diminished in any way. Distinctions between corporate identity and products must be clearly delineated. There must be no explicit or implicit appearance of Smithsonian endorsement of the Special Event co-sponsor or its products, services, or mission.

1. Invitations and printed materials. For any Event-related printed materials, (including invitations, brochures, registration materials, websites, etc.), there are three (3) possible scenarios for the use of logos:
 - a. Use no logos at all
 - b. Use the Smithsonian logo only (no corporate logo)
 - c. If an outside organization’s logo appears, then the Smithsonian logo must appear as well. Using the outside organization’s logo alone is not permissible.

If option c. above is selected and the Smithsonian logo and the outside organization's logo are to be used, then:

- (1) The Smithsonian's logo must be **at least as large** as the outside organization's logo.
- (2) The Smithsonian logo should generally appear first (to the left in horizontal listings or above other logos in vertical listings).
- (3) While use of corporate logos may be permitted, use of slogans, catch phrases, advertising language and product promotion is strictly prohibited. Logo use is limited to corporate identity, not promotion in any other form.

2. Event décor. At private Events held during non-public hours, approval for logo use in elements of Event décor should follow an "air of permanence" standard: the less the logo use appears to be a part of a permanent installation at the Host Facility, the more likely the use will be approved. For private Events not open to the public, logo display that is temporary, one-time or otherwise non-permanent in nature, and that will leave the museum at the conclusion of the Event may follow less stringent guidelines. Using an outside organization's logo in lighting gobos or on cocktail napkins would be permissible because such elements do not have an air of permanence and could not be interpreted as permanent installations in the museum.

If media are going to cover an Event, the placement of corporate logos in Event décor must be carefully considered prior to approval by the Smithsonian authorizing official.

3. Podium Seals, Banners, Stage Backdrops, etc. All logo and corporate identity use in this category should follow the guidelines set forth in this section above.

If there is a speaking program or some other form of central focal point at an Event (i.e., a stage, microphone, stage backdrop, podium, etc.) then the Smithsonian logo must have a visual presence. The Smithsonian flag is not considered adequate for this visual presence as it is not widely recognizable. Most often this will take the form of the podium seal.

However, if there is no podium being used, but the outside organization wishes to use a stage backdrop, the Smithsonian logo must be on the backdrop as well.

If a podium is being used, then the Smithsonian seal must be on the podium. The only exception to this is in the case of the President and/or Vice President of the United States, who provide the official White House podium.

In general, banners are discouraged at Events. However, if a banner is used, then there must be an appropriate Smithsonian presence on the banner, and this presence must follow the guidelines set forth above. Again the “air of permanence” standard should be taken into consideration when determining the appropriateness of banner use. With the exception of the National Zoological Park, where banners may be tied to trees, the use of a banner generally means that the banner will need to be affixed to a wall or ceiling. This does not typically look “temporary” but more like a permanent installation, and the banner use should not be authorized.

4. Gift bags and other Event give-aways. Event gift bags (“goodie bags”) to be distributed as guests depart an Event are permissible. However, the contents and exterior design of any such gift bag must be approved by the Smithsonian in advance, and the gift bag must include a Smithsonian membership brochure.

K. CATERING AND VENDOR PROCUREMENT

1. Vendor Procurement by Smithsonian Units.

Consistent with Institutional policy concerning the purchase of food and beverages with Trust funds, Sponsoring Officers may acquire outside catering services for Special Events using those funds unless otherwise prohibited by the type of fund or other restrictions imposed on the use of the funds. Federal funds may not be used to contract for outside catering services, nor may Trust funds, other than honoraria, be used to cater Events attended by staff only. The Sponsoring Office can acquire catering services using limited procurement authority delegated from the

Office of Contracting (OCon) or by submitting a requisition to that office.

2. Vendor Procurement by an Outside Organizations.

When an outside organization co-sponsors an Event with a Sponsoring Office, the parties may agree that the outside organization will contract the necessary Event services and vendors.

- Bona fide Requirements. The sponsoring office will provide to the outside organization as far in advance as possible a written list of all bona fide requirements for catering vendors (see Section XIII, E.)
- Vendor Selection: The outside organization may select vendors with the approval of the Sponsoring Office Events Coordinator. Any vendor selected must meet the Smithsonian's bona fide requirements for health and safety, liability coverage, workers' compensation, and hold-harmless provisions. At the request of the outside organization, the Sponsoring Office may provide a list of potential vendors but must indicate that this list is neither all-inclusive nor exclusive.

L. INSURANCE

Liability. As a part of the letter of agreement for co-sponsored Events, each non-Smithsonian Institution organization shall indemnify and hold harmless the United States and the Smithsonian Institution, their agents and employees, against any and all damages, claims or other liability due to personal injury or death, or damage to or loss of the property of others, arising out of its use of Smithsonian Institution facilities.

Every non-Smithsonian organization involved in an Event must maintain adequate liability insurance coverage during the term of the agreement for the use of Smithsonian facilities for a Special Event. Certificates of Insurance are kept on file in OSEP.

Catering firms, contractors, and other Event vendors such as lighting and staging vendors must name the Smithsonian Institution as an Additional Insured on their required liability insurance coverage and must provide a Certificate of Insurance evidencing that Additional Insured status as well as the policies and minimum limits

delineated in Appendix J - Vendors' insurance requirements.

X. Donations and Other Payments

- A. Donations.** Each Sponsoring Office must establish a minimum donation in return for which a celebratory Special Event may be held. This minimum donation shall be approved by the Special Events Policy Committee. A list of the minimum donations for Smithsonian facilities shall be maintained by the Office of Special Events and Protocol. While each Sponsoring Office may set its own minimum donations, units should have a defensible rationale that justifies their minimum donations. Minimum donations may vary among Smithsonian facilities.

Each Sponsoring Office also may establish a level of donations below the minimum donations to allow non-profit organizations, particularly those whose organizational missions are aligned with the Smithsonian's, to utilize Smithsonian space. For example, many non-profit organizations (e.g., National Association of Elementary and Middle School Teachers, National Science Teachers Association, et. al.) provide services to the Smithsonian by publicizing Events, promoting visits and writing articles about Smithsonian programs, thereby supporting our public outreach and educational goals. Building and maintaining these types of relationships is critical and co-sponsoring Special Events with these organizations is an important means of relationship cultivation.

- B. Types of Payments.** Several types of payments may be expected in connection with a Special Event at the Smithsonian: a donation from the outside organization, a direct expense charge, and/or an administrative charge.
- 1. Donations.** An outside organization which makes a substantial donation to the Smithsonian or to a museum, research center, or office, may co-sponsor an Event with the Smithsonian or with the museum, research center or office to recognize that donation. The minimum donation for which an Event recognizing a donation may be held is within the discretion of each facility's authorizing official.

Corporations that intend to take their donation as a charitable contribution deduction are subject to Internal Revenue Service requirements of specific acknowledgments from donees, including a valuation of goods and services provided by the donee in return for the gift. The sample letter of agreement found in Appendix C provides language necessary to inform the donor of this obligation. Among the goods and services provided to the donor is the value of the space in which the Special Event is held. In order to inform donors of the value of the goods and services provided by the Sponsoring Office in return for the donation, each Host Facility must maintain a schedule of the cost of comparable commercial spaces, updated at least every three years.

2. **Direct Expense Charge.** Also known as Support Costs. Direct expenses include the actual costs to the Host Facility for Smithsonian support staff and other Smithsonian services required specifically for the immediate support of an Event. Direct expenses are calculated based upon the time and pay rates of the staff involved or on the actual charges for other services. The types of staff support available and the guidelines governing the use of that support are outlined in Section XIII, D. A schedule of charges for services appears in SD-401 Appendix H. Support units (e.g. Building Management, OPS, OFEO) will supply, in advance, the sponsoring office with a cost estimate of direct expenses for the Event. This estimate may be subject to adjustment after the Event, based upon the actual expenses incurred by the Smithsonian.
3. **Administrative Charge.** The administrative charge covers a portion of the cost of the Event that is incurred by the Host Facility, but that is neither normally nor easily attributable to a particular Event. These costs include the general operation, maintenance, and repair of the facilities involved, and the support of Host Facility staff or OSEP staff.

Each Authorizing Official of a Host Facility will establish a schedule of administrative charges for Events held in that space. Each schedule will base the charges upon such considerations as the nature of the organization sponsoring the Event, the number of guests or participants at the Event, whether the

Event requires exceptional effort and supporting services, whether the Event is expected to be of unusually long duration, and/or whether the Event requires large amounts of space. This schedule may vary between facilities.

In general, an administrative fee may not be charged to a Smithsonian Sponsoring Office using solely Smithsonian funds to pay the event. However, if any portion of the funding of an event comes from a non-Smithsonian organization, then the Host Facility may assess an administrative fee to the Smithsonian Sponsoring Office.

Funds received from administrative charges must be used for purposes that relate to the reimbursable services involved.

4. **Consolidated Payments.** A Sponsoring Office may elect to provide an outside organization with a single, consolidated payment that incorporates two or three of the payments described above. If a Sponsoring Office elects to use a consolidated payment system, the confirmation letter must identify which part of the consolidated payment is a donation, and must still provide the valuation of goods and services provided in return.

C. Use of Smithsonian Facilities by Smithsonian Units.

Because Smithsonian facilities must be utilized by all Smithsonian units for Special Events in order to achieve the Smithsonian strategic plan and mission, Events hosted and/or sponsored by a Smithsonian unit or office, which are paid for using Smithsonian funds exclusively, shall not be charged administrative fees.

Units with significant public programming or who otherwise utilize Smithsonian facilities on a regular and frequent basis (e.g. FONZ and the Renwick Alliance) directly contribute to the wear and tear and replacement needs within facilities. Therefore, those offices may be subject to an annual negotiated administrative fee. A single comprehensive administrative fee will be negotiated by the unit and individual host facilities annually. These administrative fees shall be based on demonstrable long-term replacement costs for the facilities and equipment in a building, and documentation

of replacement/refurbishing expenses shall be provided at the time of negotiation. These fees shall not be based on a portion of the salaries and benefits of staff in the facilities.

1. The Smithsonian Associates Events/Programs. The Smithsonian Associates (TSA) programming represents a significant component of educational and cultural programming at the Institution and is an integral part of the Institution's mission. For this reason, TSA programming must be given high priority in determining use of space for Events. On at least an annual basis, TSA will negotiate an agreement with each facility director (excluding the Ripley Center) on the use of the building space which delineates TSA's plans for use of space and establishes an annual fee for this use. The intent of these agreements is to accommodate the needs of the host facility and TSA to the greatest extent feasible. The facility director of each Smithsonian building should appoint a TSA liaison for this purpose.
2. Smithsonian Corporate Membership Program, Smithsonian Business Ventures and other Revenue Generating Organizations. Events held by Smithsonian organizations as a result of revenue generation (such as Corporate Membership, *Smithsonian Magazine* Events, etc.) will be subject to administrative fees.
 - Smithsonian Corporate Members brought to the Institution by the Office of Development occasionally express interest in co-sponsoring Events at the Smithsonian. In such cases, the Office of Development will provide the host facility with a \$5,000 administrative fee for each Event that is co-sponsored.
 - *Smithsonian Magazine* and other Business Ventures and revenue generating Events must likewise ensure that the host facility is provided with a \$5,000 administrative fee for each Event that is co-sponsored.

D. Waiver of Direct Expense and Administrative Charges. Direct expense charges cannot be waived.

The administrative charge may be waived only at the discretion of the Authorizing Official. For an Event co-sponsored with an outside organization and an individual

at the level of Deputy Secretary, Under Secretaries or above, or by offices reporting to the Deputy Secretary or the Under Secretaries, the administrative charge may be waived only by the Deputy Secretary. The Deputy Secretary will consult with the Under Secretaries and/or the Special Events Policy Committee when appropriate. The decision to waive this charge is made on a case-by-case basis, *but such waivers should be rare and documented.*

E. Payment.

1. Use of Smithsonian Funds for Special Events: Smithsonian units sponsoring Events and using Smithsonian funds to cover Event expenses shall comply with the guidelines set forth in the Office of Planning, Management and Budget (OPMB) memo *Use of Trust Funds for Representational and Special Event Expenses*, which is available online at: <http://prism.si.edu/oc/OPMB8.doc> Federal funds may not be used for Special Events.
2. Donations for co-sponsored Events with outside organizations must be received no later than one month prior to the Event. Events for which the donation has not been received by this date are subject to cancellation by the Smithsonian.
3. Direct Expense and Administrative Charges: The Sponsoring Office is responsible for all costs. As such, that office is responsible for billing the outside organization directly for all costs incurred. Charges to the Sponsoring Office for direct expenses and administrative fees are billed after the Event, directly from the Smithsonian office that provided the service. These bills must be issued no later than ten (10) days after the Event. These charges are due net thirty (30) days from the date of the invoice. Direct and administrative charges will be included in one invoice. Form SI-5 (Invoice for Services) will be used for this purpose (See Appendix K). Offices may contact the Office of the Comptroller to obtain information on the correct procedures for the use of this form.
4. Reimbursement to Smithsonian support units for Direct Expenses. Once the Sponsoring Office has received payment, it will reimburse other Smithsonian organizations for their expenses. If payment is not received from the outside organization for direct costs

within three (3) months of an Event, the Sponsoring Office must reimburse the Office of Protection Services, the Office of Facilities Operations and Engineering, the Office of Imaging and Photographic Services, the Audio-Visual Branch, and Horticultural Services for those costs with funds from the Sponsoring Office's own budget.

XI. Cancellations

Any notice of the cancellation of an Event by an outside organization co-sponsoring the Event or by a Smithsonian museum, research center or office must be received by the Host Facility Event Coordinator no later than (10) working days before the Event is scheduled to be held.

If such notification is received within the required time, and the organization wishes to reschedule the Event, the Host Facility will make every effort to reschedule the Event at a mutually agreeable time.

If notification is not received within the required time, and the outside organization wishes to reschedule the Event, the Host Facility may, at its discretion, reschedule the Event. If the organization does not wish to reschedule the Event, the host Sponsoring Office may assess a late cancellation charge of \$1,000 as a partial reimbursement for direct costs incurred to that date.

A donation is not a charge for an Event and is non-refundable.

XII. General Conditions, Limitations and Regulations

A. General Conditions and Limitations. The following General Conditions and Limitations must be included in each agreement for a Special Event with an outside organization. Requests for waivers of any part of these General Conditions and Limitations must be approved by the Office of General Counsel.

1. Non-compliance with Smithsonian Policy and Procedures. The Smithsonian Institution reserves the right to deny the use or the continued use of its facilities to any person or organization not in compliance with Smithsonian policy and procedures.

2. Liability. As part of the letter of agreement for co-sponsored Events, each non-Smithsonian Institution organization shall indemnify and hold harmless the United States and the Smithsonian Institution, their agents and employees, against any and all damages, claims or other liability due to personal injury or death, or damage to or loss of the property of others, arising out of its use of Smithsonian Institution facilities.
3. Insurance. Every non-Smithsonian organization involved in an Event must maintain adequate liability insurance coverage during the term of the agreement for the use of Smithsonian facilities for a Special Event. Certificates of Insurance are kept on file in OSEP.

B. Building Regulations

1. Authority. Smithsonian Institution building regulations govern many applicable aspects of Special Events and are based on the following statutes and regulations:
 - 20 USC section 41 et. sea.
 - 40 USC section 193 (n)-(w)
 - 36 CFR chapter 504 and 520
2. Protection and Safety. Each Special Event requires adequate protection and safety. In all instances the Office of Protection Services (OPS), in consultation with the Authorizing Official, will determine the number of security officers or other staff that will be necessary to maintain an adequate level of security.

The Office of Environmental Management and Safety will evaluate safety aspects of an Event and may require groups to take specific measures to ensure safety.

3. Occupancy Limits. Applicable fire and other regulations do not permit variations from established occupancy limits. The Office of Safety, Health and Environmental Management (OSHEM) establishes the occupancy limits. The Office of Protection Services and the building manager will enforce occupancy limit regulations. It is the duty of the OPS security staff supporting Special Events to know and enforce occupancy limits.

4. Closing of Building. It is the policy of the Institution that public spaces should remain open to the public during visiting hours. Under special circumstances, the authorizing official and the Special Events Policy Committee will coordinate the approval when a Special Event requires the closing of a Smithsonian museum, a substantial portion of it, or any public area during visiting hours. The authorizing official or designee must give prior approval for the closing and must give public notification as soon as is practical.
5. Museum Visits by Dignitaries. Visits by domestic and foreign dignitaries can involve special security requirements by outside agencies such as the Department of State or the United States Secret Service. When these visits occur during normal public visiting hours, they can result in the closing of portions of, or in some cases, an entire museum for some period of the day.

While visits by dignitaries are welcome, there have been instances where their accommodation occurred primarily at the expense of the general public. With the approval of the Board of Regents, procedures have been established in Smithsonian museums to minimize public inconvenience and to ensure maximum public access to exhibitions. These measures include the scheduling of dignitaries' visits at times when a museum is not open to the public, such as before its morning opening. When it is not possible to schedule a time that would avoid closing a museum to the public, the visit should be scheduled during the least crowded times of a day, and public closing should be delayed until the last possible moment.

The Office of Special Events and Protocol and the Office of Government Relations must be notified immediately of any scheduled visits by dignitaries. OSEP will serve as the central point of contact for dignitaries' advance staffs, and will work with appropriate Smithsonian offices, including the Sponsoring Office and the Offices of Government Relations, International Relations, and Protection Services to ensure that all logistical details and protocol are properly executed.

6. Use, Sale and Handling of Liquor. The consumption of liquor is permitted at officially sanctioned, co-sponsored Events. The consumption of liquor at all other Events is permitted when approved by the Secretary or his designees. As designees, directors may authorize such use and are responsible for the safe and prudent administration of this policy. Any abuse of this policy, including the consumption of alcohol at unsanctioned Events, will be cause for the Secretary to withdraw the delegation of authority. If the liquor is being served by employees rather than caterers, the host facility director shall designate a responsible employee to be present at the Event to ensure that minors do not handle or consume alcohol and to prevent visitors or employees from over-consuming. If the liquor is being served by caterers, the caterer has these and other responsibilities.

The sale of liquor generally will not be permitted within Smithsonian buildings except in dining rooms/restaurants. The sale of liquor to guests at Special Events will be permitted only when prior approval has been obtained from the Special Events Policy Committee.

At the conclusion of any Special Event at which alcoholic beverages are served, all full or partial bottles will be secured and inventoried by the Event coordinator in charge. Any bottles which are not returned immediately to the caterer or retailer shall be placed in boxes and sealed with tape. The boxes shall be placed in storage under the supervision of the Special Event coordinator.

- C. Force Majeure/Sovereign Act Clause.** All written letters of agreement with outside organizations must contain a Force Majeure/Sovereign Act clause. See Procedures Section and Appendix C or consult the Office of the General Counsel for specific wording.

XIII. Procedures

A. Application for Facilities for Special Events (Form SI-600)

The form SI-600 is designed to provide for the request and approval of space for a Special Event and to provide for the preliminary preparation and execution of Special Events once approved. An example of the SI-600 is provided in Appendix B. It is the responsibility of the Authorizing Official to ensure that the SI-600 contains sufficient information to evaluate the appropriateness of the Event. The SI-600 and any other paperwork, must be submitted within a time frame established by the Host Facility Event Coordinator (or OSEP coordinator when applicable), taking into consideration the scope and complexity of the Event.

1. Processing of Requests, Approval by Authorizing Official and Related Steps.

- a. After the Sponsoring Office confirms the availability of the desired space (and after approval by the Special Events Policy Committee, if necessary), it completes Parts I, II and III of the SI-600 and forwards it to the Authorizing Official for approval.
- b. The Authorizing Official or designee approves the Event and completes Part IV of the SI-600 form. For all Special Events, the authorizing official will give approval within seven (7) working days unless the Authorizing Official is notified in the interim by other SI-600 recipients of any special circumstances. The Authorizing Official, or designee, must sign the SI-600, indicating the approval of the Event and ensuring standardization on the approval process before committing resources to support Events.

Space is committed when the Event is approved by the Authorizing Official. Telephone calls to reserve a space do not constitute approval. Smithsonian applicants may telephone initial requests to the Authorizing Officials and receive tentative approval, but confirmation is contingent on a fully executed SI-600.

- c. Distribution of SI-600: The file copy remains with the Authorizing Official. The Authorizing Official distributes the remaining copies as follows:
- Office of Special Events and Protocol (OSEP)
 - Host Facility Event Coordinator
 - Host Facility Building Manager
 - Host Facility Security Manager
 - Office of Safety, Health and Environmental Management (OSHEM)
 - Sponsoring Office

The recipients of the SI-600 copies will review scheduling, requirements and other facets of an Event and inform the Authorizing Official within five (5) days if there is a reason not to concur. Non-response signifies concurrence or approval.

B. Scheduling:

1. To alert OSEP to a potential conflict in scheduling, the Sponsoring Office must indicate in the upper right corner of form SI-600 if the Event will include invitations to any of the following:

- Secretary, Deputy Secretary, and Under Secretaries
- Regents
- Regents Emeritus
- Members of Congress
- Officials of the Executive Branch
- Smithsonian Senior Staff (including Museum, Research Center and Office Directors)

If the space provided on the form SI-600 is not adequate, a separate list may be attached to the form.

2. **Resolution of Scheduling Conflicts.** When two or more Special Events are scheduled for the same time and date, the Director of OSEP will attempt to minimize such conflicts through discussion/negotiation with the appropriate sponsoring offices and/or Event coordinators. This is especially important when the same constituents and/or participants (e.g., Smithsonian officials, Members of Congress, the media, et. al.) would be invited to two Events on the same date. In some cases, the Event date will need to be changed, particularly if the Event involves high level officials of the Smithsonian and others in the community.

If initial attempts at negotiation fail to ameliorate the scheduling conflict, the Director of OSEP will consult with the Special Events Policy Committee and/or the appropriate Deputy/Under Secretary. The Deputy/Under Secretary ultimately has final authority in conflict resolution

C. Written agreement for co-sponsored Events. Each Sponsoring Office must have its own written letter of agreement with the outside organization which outlines all components of the Event. This letter will confirm the Event date, the donation involved (if applicable), and other financial obligations of the donor or organization, as well as an overview of the program components, number of guests expected, and Event scenario, and cancellation clauses. This letter of agreement must contain Force Majeure language. (See Sample in Appendix C or consult with OGC if Appendix C is not sufficient for a particular purpose.)

The responsibility of preparing and distributing this letter of agreement belongs to the Sponsoring Office Event Coordinator.

This formal letter of agreement must be signed by the donor or organization representative, and by the Sponsoring Office, and must be returned to the Host Facility Event Coordinator by the date specified in the letter. If the sponsoring office is not the Host Facility, the letter of agreement must also be signed by the director of the Host Facility or designee.

D. Obtaining Internal Support Services. The Sponsoring Office must reimburse each support unit for actual expenses even in cases when the outside organization fails to make payment. Once space has been approved by the Authorizing Official, the following procedures and forms are necessary for obtaining internal support services.

1. Building Manager Support. The request for Building Services (Form SI-23) is used to obtain the services of building management staff, (including custodial and labor services), and the Office of Facilities Engineering and Operations (OFEO). The SI-23 also documents service charges for that support. An example of SI-23 can be found in Appendix D.

To enable requesting offices to develop complete budgets for an Event, building managers and relevant

OFEO offices will supply the sponsoring office with a cost estimate for the requested services within three (3) working days of receipt of the SI-23.

When using the SI-23 for Special Events, it should specify:

- The nature of the Event
- The space involved
- The date of the Event
- The name of the outside organization
- Lighting requirements (designate specific rooms and lights)
- Necessary accounting information

The Event Coordinator prepares a Special Events memo to specify the details of the Event. (See Appendix E for a sample event memo.)

- 2. Protection Services.** The Office of Protection Services (OPS), in consultation with the building director and/or designee, will determine security requirements for an Event, including the number of security officers, elevator operators, and other staff needed. No later than one (1) week prior to the Event, all Sponsoring Offices holding Special Events must submit to the Host Facility security office a Request for Protection Services Special Event Support Form (SI-3506) for each Event scheduled for the following month. A copy of Form SI-3506 can be found in Appendix F.

Within three (3) working days of submission of the SI-3506 to OPS, the Host Facility security office will provide sponsoring offices with a cost estimate for the requested services.

The Sponsoring Office is responsible for the cost of overtime for security even in cases where the outside organization fails to forward the funds. Protection Services will be reimbursed by the Sponsoring Office. Adjustments for reimbursement of overtime must accompany any changes in Event times. When an Event is canceled with less than 24 hours notice, Protection Services will collect reimbursement of two (2) overtime duty hours for every security officer who was scheduled to report to the Event.

3. Horticultural Services. The Horticulture Services Division (HSD) maintains a limited number of foliage plants and flowering plants for Smithsonian Special Events in the Washington metropolitan area.

- a. Request Guidelines: If HSD is to supply plants for an Event, the sponsoring office must complete Form SI-780. Appendix G contains an example of the form. Blank copies of SI-780 are available in HSD. The Greenhouse Nursery Branch of HSD must receive the SI-780 at least five (5) working days before the Event.

Sponsoring Office should refer to SD-401 Appendix H for the established rate schedule for using plants supplied by HSD. HSD will make every attempt to make special arrangements when the SI-780 is received at least ten (10) working days before the Event.

If HSD is unable to fill requests for additional plants from its own stock of plants, HSD reserves the right to lease or purchase plants from a vendor and to request reimbursement from the Sponsoring Office. In such cases, the sponsoring office will be notified in advance if leased or purchased plants must be used.

- b. Delivery and Pick-up: HSD business hours are from 7:00 a.m. to 3:00 p.m., Monday through Friday. Requests for deliveries and pick-ups before or after those hours are subject to overtime charges. Plants are delivered and picked up from a single location in the Host Facility. Requests for HSD to install plants throughout the space used for the Event are subject to overtime.
- c. Other Services: On rare occasions, HSD will support Smithsonian Events in the Washington, D.C. area which are held at non-Smithsonian facilities. Requests for such services must be submitted in writing to the Chief of Horticultural Services Division for approval 30 days prior to the Event.

If there is a continuing requirement for plants in a museum area frequently used for Special Events, the museum may make arrangements with HSD to

place that area on the Institution's regular rotation of interior plantings.

The Sponsoring Office is responsible for reimbursing HSD for any damaged or missing plants. HSD is not responsible for conducting building searches for missing plants.

4. Audio-Visual Support. The Audio-Visual Services Branch in OFEO provides a wide range of audio-visual services in support of Smithsonian museums and offices. An SI-23 is used for requesting and scheduling these services. When audio-visual needs are included on an SI-23, the Sponsoring Office will forward a copy of the SI-23 directly to the Audio-Visual Services Branch at least two (2) weeks before the services are required. Charges are billed for technician hours according to established hourly rates, which are outlined in SD-401 Appendix H. Staff of the Audio-Visual Services Branch are available to provide information, cost estimates and assistance as needed.

5. Photographic Services.: The Sponsoring Office must submit Form SI-800 to Smithsonian Photographic Services (SPS) to obtain photographic services for Smithsonian archival or publicity purposes. Appendix I contains an example of Form SI-800. SPS will provide information on cost estimates and staff availability. Museum Public Affairs offices may also take photographs for official use, and museum Special Events offices may also arrange for those services for a fee.

Photographers at Special Events normally will photograph the program activity and persons involved. SPS photographers take photographs for official use. The Office of Public Affairs or host facility public affairs office will coordinate, in advance, photographs for publicity purposes.

Photographic services for Smithsonian sponsored Events during regular duty hours are provided at no cost. For overtime assignments, there is a minimum charge of two hours; however, photographic service duration should be kept short. Photographers are not available for all-day meetings or performances.

SPS provides official photographs at no charge when the request conforms to the above limitations. When requested, duplicate transparencies or prints are supplied in accordance with SD-407. See Appendix H for the established Rate Schedule. Individual photographs can be purchased using SI Form 318, Photo Order. Payment must accompany the order in advance.

It is the responsibility of the Sponsoring Office to invoice the outside organization for all photographic services.

SPS maintains a photo library containing the photographs taken by SPS photographers. Outside organizations requiring photographs from Special Events should make arrangements to hire photographic coverage. SPS can assist the agency in making these arrangements.

6. Rate Schedule. A Rate Schedule for Support Services personnel and equipment rental is found in Appendix H. Individual support units may not unilaterally raise their fees. Rates will be reviewed annually by a Rate Schedule Committee based on criteria established by the Committee. The Committee is composed of the Director of the Office of Planning, Management and Budget, The Comptroller, the Director of the Office of Facilities, Engineering and Operations, and is chaired by the Chair of the Special Events Policy Committee.

E. Vendor Procurement Consistent with Institutional policy concerning the purchase of food and beverages with Trust funds, museums, research centers and offices may acquire outside catering services for Special Events using those funds **unless** otherwise prohibited by the type of fund or other restrictions imposed on the use of the funds. Federal funds may not be used to contract for outside catering services, nor may Trust funds, other than honoraria, be used to cater Events attended by staff only. The Sponsoring Office can acquire catering services using limited procurement authority delegated from the Office of Contracting (OCon) or by submitting a requisition to that office. As with any other Trust fund expenditures, these transactions should be completed in

a manner which reflects fiduciary responsibility and which conforms with these four basic policies:

- a. The bona fide requirements of the Special Event and expectations of participants must be met. The Sponsoring Office Event Coordinator will specify, in advance, in a clear and consistent manner to all prospective catering contractors these requirements.
- b. For all types of Events vendors, adequate competition will be sought to minimize costs and satisfy procurement policies and procedures.
- c. Increased opportunities for small, minority- and women-owned businesses will be of paramount consideration when developing needs and seeking catering services.
- d. Procurement will be conducted with propriety, integrity and accountability in accordance with SD-314 and SD-103.

1. Bona fide Requirements. Catering requirements include menu and quantity requirements, capacity to handle size and scope of the Event, special equipment needs, evidence of compliance with local health, safety and sanitation requirements, and ability to provide liability coverage for the Smithsonian through insurance and workers' compensation coverage. Insurance requirements are found in Appendix J. Requirements should be made in full and in writing as far in advance of the Event as possible

2. Adequate Competition. Whenever possible, Sponsoring Office Event Coordinators should maintain a policy of rotating catering firms and periodically testing new firms. Sponsoring Office Event Coordinators should attempt to obtain competitive bids from three (3) qualified vendors for the identical requirements in order to ensure lowest cost. As this is often not practical, Events coordinators must, at a minimum, comply with the following procedures for obtaining competitive bids:

- a. Solicit only qualified caterers and beverage companies. Qualifications must include certificates of insurance and, normally, some indication of competence either by actual Smithsonian experience or by references from other Events of like size and scope.

Sponsoring Office Events Coordinators shall inform OSEP of their experience with individual caterers, including firm name, size, whether the firm is minority- or woman-owned, type and size of Event handled, quality of food, service and ambience, and cost. OSEP shall maintain this information on file as a comprehensive resource for use by all Smithsonian Event coordinators.

- b. For catering orders of \$2,500 and under, may obtain one bid. That single bid may be accepted if the price can be justified as fair and reasonable in the judgment of the Events coordinator based on experience.
- c. For catering orders of less than \$5,000 and greater than \$2,500, attempt to obtain two bids. However, when time constraints, budget constraints, special dietary requirements, or other conditions make competition impractical, a single bid may be obtained. That single bid may be accepted if the price can be justified as fair and reasonable in the judgment of the Sponsoring Office Event Coordinator (or procuring officer) based on experience.
- d. For catering orders over \$5,000 but less than \$10,000, attempt to secure three bids. Two bids may be obtained under the same conditions as cited in iii. Above, or where further solicitation would be perfunctory.
- e. For catering orders of \$10,000 and over, obtain three bids or furnish three suggested sources as part of an SI-4 requisition to OCon.

- 3. Use of New, Small and Minority- and Women-Owned Firms.** Sponsoring Office Event Coordinators shall afford every opportunity to all catering firms and Event vendors, including new, small, minority- and women-owned firms, to do business with the Smithsonian in accordance with conditions set forth above. To achieve this goal, Event coordinators should consult regularly with OSEP files, with the SD-216, Supplier Diversity Program, and with the Office of Equal Employment and Minority Affairs (OEEMA).

F. Payment

- 1. Use of Smithsonian Funds for Special Events.** Smithsonian units sponsoring Events and using Smithsonian funds to cover Event expenses shall

comply with the guidelines set forth in the Office of Planning, Management and Budget (OPMB) memo *Use of Trust Funds for Representational and Special Event Expenses*, which is available online at: <http://prism.si.edu/oc/OPMB8.doc> Federal funds may not be used for Special Events.

2. Donations. Donations for co-sponsored Events with outside organizations must be received no later than one month prior to the Event. Events for which the donation has not been received by this date are subject to cancellation by the Smithsonian.

3. Direct Expense and Administrative Charges. The Sponsoring Office is responsible for all costs. As such, that office is responsible for billing the outside organization directly for all costs incurred. These charges are due net thirty (30) days from the date of the invoice. Direct and administrative charges will be included in one invoice. Form SI-5 (Invoice for Services) will be used for this purpose (See Appendix K). Offices may contact the Office of the Comptroller to obtain information on the correct procedures for the use of this form.

Charges to the Sponsoring Office for direct costs and administrative fees are billed after the Event, directly from the Smithsonian office that provided the service. These bills must be issued no later than ten (10) days after the Event.

4. Reimbursement to Smithsonian support units for Direct Expenses. Once the Sponsoring Office has received payment, it will reimburse other Smithsonian organizations for their expenses. *If payment is not received from the outside organization for direct costs within three (3) months of an Event, the Sponsoring Office must reimburse the Office of Protection Services, the Office of Facilities Operations and Engineering, the Office of Imaging and Photographic Services, the Audio-Visual Branch, and Horticultural Services for those costs with funds from the sponsoring office's own budget.*

Failure on the part of the outside organization to pay the administrative fee may require negotiations between the sponsoring office and the host facility.

G.

Force Majeure/Sovereign Act Clause

All written letters of agreement with outside organizations must contain the following Force Majeure/Sovereign Act clause:

“If the Smithsonian is unable to perform any or all of its material obligations under this contract because of circumstances beyond its control, including but not limited to laws, regulations, acts, omissions, demands, or order of any government, or by act of God, fire, flood, weather, war, terrorism, rebellion, or insurrection, then the Event shall be cancelled and [Event holder] shall have the opportunity to reschedule the Event. If [Event holder] declines to postpone the Event, then the agreement will terminate, and the Smithsonian will refund any administrative fees, support costs, IMAX® theater fees, or any other direct costs paid in advance, less any direct costs incurred by the Smithsonian related to the Event. Since any donation made in connection with an Event is non-refundable, if [Event holder] declines to reschedule the Event, Smithsonian will offer [Event holder] recognition for the donation that is commensurate with the amount of the donation.”

Appendix J

VENDORS' INSURANCE REQUIREMENTS

Insurance

Catering firms, contractors, and other Event vendors such as lighting and staging vendors must name the Smithsonian Institution as an Additional Insured on their required liability insurance coverage and must provide a Certificate of Insurance evidencing that Additional Insured status as well as the following policies and minimum limits. The Certificate of Insurance should disclose the full limits of coverage maintained by the catering firm or Event vendor.

Commercial General Liability. No less than \$500,000 per occurrence for Events with 50 guests or less; no less than \$1,000,000 for Events with 50 to 2000 guests; and no less than \$5,000,000 for Events with more than 2000 guests.

Liquor. Liability coverage must be a separate policy or a separate endorsement to the Commercial General Liability policy. This coverage must be specifically noted on the Certificate of Insurance. The liability limits should be the same as those for the Commercial General Liability.

Automobile Liability Coverage. No less than \$250,000 per occurrence for small businesses; no less than \$500,000 per occurrence for standard firms.

Workers' Compensation. Workers' Compensation insurance must be maintained at the statutory limits.

Indemnification and Hold Harmless Provisions

The catering firm and other Event vendors must agree to indemnify and hold harmless the Smithsonian Institution from claims, liability, costs and expenses arising from any negligent act or omission on the part of the catering firm or other Event vendor, its agents or employees that are associated with the use of the Smithsonian Institution facility including injury to guests, Institution employees, and catering firm or other Event vendor employees or agents.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 401,

August 29, 2006,

Date Last Declared Current: May 13, 2013

USE OF FACILITIES FOR SPECIAL EVENTS AND PUBLIC PROGRAMS

I. Scope	1
II. Introduction	1
III. Special Events and Public Programs	2
IV. Authority	5
V. Supplemental Information and Guidance	7
Appendix A: Special Events Policy for Outside Organizations	

I. Scope

The policies contained in this Smithsonian directive (SD) pertain to any occasion involving the use of the Smithsonian Institution's real property or facilities, as described below. The phrase "special events and public programs" includes but is not limited to various types of events, such as: meetings; conferences; film screenings; lectures; seminars; symposia; artistic performances; exhibition opening and cocktail receptions; seated and buffet dinners; luncheons; and press events; and will hereafter be referred to collectively as "special events."

II. Introduction

The primary purpose for holding special events in Smithsonian facilities is to further the Institution's mission by increasing public familiarity with and appreciation of Smithsonian collections and research, and to recognize, cultivate, and assist donors. To achieve these goals, all real property and facilities are, first and foremost, to be used for the overall benefit of the Smithsonian and, toward that end, should be used in a cooperative and collegial manner.

Museums and research centers are responsible for developing their own policies and procedures for special events, which are supplemental to and consistent with this directive. All museum and research

II. Introduction (continued)

center policies are subject to the approval of the Special Events Policy Committee, as described below. Each policy should contain special provisions for use of facilities by other Smithsonian units, which reflect the goals and purposes of this SD.

In addition, implementation of this SD is governed by the *Implementation Handbook for the Use of Facilities for Special Events and Public Programs*. The *Handbook* is available electronically at the [directives homepage](#) on Prism (under the listing for SD 401), and is maintained by the SI Office of Special Events and Protocol. Proposed changes to, and requests to deviate from, the provisions of the *Handbook* are subject to the approval of the Special Events Policy Committee.

III. Special Events and Public Programs

A. Purpose. The primary purpose for any special event at the Smithsonian is to advance the mission of the Institution.

The goal of each special event must involve one or more of the following:

- to serve the Smithsonian's broad educational mandate and its range of programs and activities, and to widen the public's understanding of the Institution
- to advance the Smithsonian's mandate for education and the diffusion of knowledge through a broad range of programs and activities
- to attract new audiences to the Smithsonian, including those who have been traditionally under-represented and under-served
- to recognize established donors, and to cultivate potential donors and collectors

B. Types of Special Events. Use of Smithsonian facilities may be authorized for the following types of official events:

**III. Special Events
and Public Programs**
(continued)

1. Smithsonian Special Events, including (a) educational programs, films, and, on occasion, public exhibition openings; (b) meetings and related events of the Board of Regents and formally constituted advisory boards; (c) development/membership/cultivation opportunities; and (d) internal events for awards, farewells, and holiday celebrations. Except in extraordinary circumstances, the sponsoring unit will be responsible only for any additional direct costs generated by the special event, such as those incurred due to increased security, audio/visual requirements, and/or event set-up.
2. Smithsonian Co-sponsored Special Events, generally initiated by an outside organization in keeping with the mission of the Smithsonian. Such events may involve the recognition of a donation to the Smithsonian. The main audience for these events usually will be affiliated with the outside organization, which is expected to underwrite the total costs of the special event. All special events held in Smithsonian facilities with an outside organization must be co-sponsored by a responsible and authorized Smithsonian unit. The host unit may charge a facility usage fee (i.e., reimbursement for indirect costs) as part of the special event's total costs. All proposed facility usage fees shall be subject to approval by the Special Events Policy Committee. More information about SI policies on special events co-hosted by non-Smithsonian organizations is available in Appendix A of this directive.
3. Other Special Events, including (a) public programs or conferences, generally initiated by an organization related to the Smithsonian Institution and its collections; (b) official Presidential Inaugural activities; and (c) at the discretion of the director and within the host unit's guidelines, federal agencies may hold events if they pay direct costs and facility usage fees and all aspects of this policy are in effect.

**III. Special Events
and Public Programs**
(continued)

C. Unacceptable Types of Special Events and Activities. The use of Smithsonian facilities will not be authorized for events with an outside organization, whether or not co-sponsorship is sought or whether the event falls within a category of event as described above, when:

1. the primary purpose of the event is social (for example, weddings, birthdays, or retirement parties);
2. the event is partisan, political, or religious in nature, is related to social advocacy issues, or is designed to promote positions inconsistent with the Smithsonian's mission; or
3. the event:
 - includes fund raising or cause-related marketing other than for the Smithsonian
 - includes a product promotion
 - benefits, predominantly or exclusively, the outside organization

No special event may:

1. charge admission fees, other than conference registration fees for conferences co-sponsored by the Smithsonian;
2. collect donations for organizations other than the Smithsonian, or hold raffles;
3. violate any federal or local law regarding the sale of alcoholic beverages or other restricted substances; or
4. display or promote commercial products or sell articles in any Smithsonian facility, with the exception of those special events conducted by The Smithsonian Associates, Friends of the National Zoo (FONZ), and the Renwick Alliance, or administered through Smithsonian Enterprises (SE).

**III. Special Events
and Public Programs**
(continued)

Although federal agencies may use Smithsonian facilities, no events will be permitted which announce, promote, advocate, or otherwise deal with policy initiatives other than those that are Smithsonian-related.

Under exceptional circumstances, the Secretary, the Under Secretary for Finance and Administration (USF&A)/Chief Financial Officer (CFO), or the other Under Secretaries may waive these restrictions. The requesting unit must direct all requests for waivers through the Special Events Policy Committee.

Consistent with the objectives of Title VI of the Civil Rights Act of 1964, Smithsonian facilities shall not be made available to any organization that practices or advocates discrimination based on age, sex, color, religion, national origin, or condition of handicap.

IV. Authority

**A. Officials Authorized to Approve the Use of
Facilities**

The officials authorized to approve the use of facilities for Smithsonian events are the building directors for areas under their jurisdiction. Each building director is responsible for establishing a written policy governing special events held on the premises of the building under his or her purview, and is accountable for the results of the event to the appropriate USF&A/CFO or other Under Secretary. Such policies and guidelines must be consistent with the provisions of this directive.

Each policy must be reviewed and approved by the Special Events Policy Committee for its consistency with these provisions prior to issuance.

B. Special Events Policy Committee

1. The Special Events Policy Committee was established to:

IV. Authority
(continued)

- oversee the use of Smithsonian facilities for special events as prescribed herein, and to make decisions based on the best interests of the Institution
 - provide advice on any policy issues that may arise
 - review unit and office special events policies for consistency with this SD
 - consider potential interference with visitor access during normal hours of operation
 - receive requests for waivers of these guidelines and recommend appropriate action to the Secretary and USF&A/CFO or other Under Secretaries
2. Composition. The Special Events Policy Committee consists of the following members:
- Chief of Staff to the Secretary, Chair
 - Director, Office of Special Events and Protocol (OSEP), Vice Chair
 - Designated representative of the USF&A/CFO
 - Designated representative of the Under Secretary for History, Art and Culture
 - Designated representative of the Under Secretary for Science
 - Designated unit Special Events Coordinator, on a two-year rotating basis
 - and of counsel:
 - General Counsel (or designee)
 - Director of Advancement (or designee)

IV. Authority
(continued)

- Director, Office of Government Relations (or designee)
- Director, Office of Communications and External Affairs (or designee)
- Director, Office of Facilities Engineering and Operations (or designee)
- Representative of internal co-sponsor of the special event under discussion

C. Final Authority

The Secretary has the final authority to approve or disapprove any special event held on Smithsonian property at any stage of the process.

V. Supplemental Information and Guidance

Supplemental guidance is contained in the *Implementation Handbook for the Use of Facilities for Special Events and Public Programs*, which is authorized by the Special Events Policy Committee, maintained by the Office of Special Events and Protocol, and available on Prism. Among other things, the *Handbook* provides more complete explanations of the provisions of this directive as well as a summary of the Smithsonian's policies and their implementation, which may be publicly circulated.

In addition, the Smithsonian policy for special events co-hosted by or involving non-Smithsonian organizations is described in more detail in Appendix A of this directive.

CANCELLATION:
INQUIRIES:

SD 401, March 9, 1995
Office of Special Events and Protocol - Office of the Deputy Secretary/Chief Operating Officer

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 401
Appendix A

August 29, 2006

**SMITHSONIAN INSTITUTION SPECIAL EVENTS POLICY
FOR OUTSIDE ORGANIZATIONS**

I. Introduction	1
II. Approval Criteria/Process	2
III. Terms	3
A. Confirmation/Written Agreement	3
B. Museum Staff Participation	3
C. Event Time Frames	4
D. Speaking Program	4
E. No Smoking Policy	4
F. Logos and Trademarks	4
G. Invitation/Program Design and Copy	5
H. Invitation Guest List Policy	5
I. Promotional/Advertising Materials	5
J. Videotaping/Recording	7
K. Catering Firms/Vendors	7
L. Guarantee	9
M. Liability and Insurance	9
N. Entertainment	9
O. Unanticipated Interruptions	9
P. Force Majeure	9

I. Introduction

We are so pleased that your organization is planning to co-host an event with the Smithsonian Institution. The success of your event is very important to us and our Special Event Coordinators are eager to assist you and help make your event a wonderful occasion.

The Smithsonian Institution is supported by federal appropriations, the trust resources of the Institution, and by the generosity of donors — including foundations, corporations, organizations/associations, and individuals. Because there is no public admission charge to Smithsonian facilities, it is through such private financial support that many of the activities of the Smithsonian are made possible.

I. Introduction
(continued)

It is traditional for organizations which offer a substantial unrestricted donation to a Smithsonian museum to be invited to celebrate the gift by co-sponsoring a special event in the museum. Such a celebratory occasion provides an opportunity for the museum and the donor to jointly commemorate their collaboration. However, although the Smithsonian allows reasonable latitude in the recognition of donors, it must be clear that such acknowledgement is in appreciation for the gift, rather than as a commercial endorsement.

The Smithsonian is grateful for your very generous donation. These funds will be used for various urgent needs, including educational programs, the restoration of our artifacts, and for the design, fabrication, maintenance, and operation of our exhibits. Your contribution helps the Institution bring the collections and programs we all value so highly to the millions of visitors who come to the Smithsonian every year from all over the world.

The following policies apply to co-hosted special events in the museums of the Smithsonian Institution. This special events policy for non-Smithsonian organizations supplements the provisions of the Institution's policy for special events outlined elsewhere in SD 401.

**II. Approval
Criteria/Process**

- A. Consistent with the objectives of Title VI of the Civil Rights Act of 1964, Smithsonian facilities shall not be made available to any organization that practices or advocates discrimination based on age, color, religion, sex, national origin, or condition of handicap.
- B. Non-Smithsonian-related events such as fund raisers for other than the Smithsonian Institution and those events of a political, religious, promotional, or personal nature (e.g., weddings) may not be held at the Smithsonian. In addition, no commercial, ticketed events are permitted.

III. Terms

A. Confirmation/Written Agreement

1. The museum's special events office will prepare a Memorandum of Agreement that confirms the event date, the contribution, number of guests expected, and event scenario.
2. The Memorandum of Agreement must be signed by the donor/organization representative and returned to the museum's special events office by the date specified in the letter.

B. Smithsonian Staff Event Participation

1. All special events in Smithsonian facilities are co-hosted by the museum and the donor/organization. The director of the museum, or designee, acts as co-host at the special event.
2. Official welcoming remarks, delivered by the director of the museum, or designee, are a traditional part of a co-hosted event at the Smithsonian. This allows the museum a brief opportunity to represent the Smithsonian in acknowledging the significance of the occasion and the generosity of the donor.
3. On occasion, a number of senior Smithsonian staff attends co-hosted special events. The exact number will be determined by mutual consent with the co-host on a case-by-case basis. Names and titles of these individuals will be provided to the donor/organization, if requested. This represents an important element in the overall public education/outreach program of the Smithsonian.
4. The museum's special events office is an integral partner in all phases of the event process as well as a resource for assistance. A designated Special Events Coordinator has final approval over all aspects of the event, and will work directly with a single point of contact from the participating organization throughout event planning.

III. Terms (continued)

C. Event Time Frames

1. As a matter of Smithsonian policy, special events should not interfere with the normal public visitation to the museum. The regular operating hours of the Smithsonian museums are 10:00 am to 5:30 pm. Given the need to allow for proper cleaning from the day's visitors to the Smithsonian, event time frames must be approved by the museum's special events office.
2. Receptions and dinners, including a program, are designed for up to a three-hour time period.
3. Requests for morning or daytime events will be handled on a case-by-case basis.

D. Speaking Program

Should guest speakers be included as a part of the event, the speaking program and/or topic must be non-partisan in nature. Each speaker's name and topic must be submitted in writing to the museum's special events office prior to the event. The Smithsonian host will make welcoming remarks and introduce the co-host.

E. No Smoking Policy

Smoking is **not** permitted in any Smithsonian Institution building at any time.

F. Logos and Trademarks

1. Any use of the trademark or logo of a donor/organization in connection with the event must be approved in advance in writing by the Smithsonian. Requests for all approvals of this nature are to be facilitated through the museum's special events office, and are subject to the Smithsonian's policies on donor recognition.

III. Terms (continued)

2. The trademark or logo of a donor/organization may not be placed on the invitation to the event, except in certain specific cases. If it is used, the Smithsonian logo must also be incorporated, and the invitation must be cleared in advance. As an alternative, the donor's logo may be incorporated on an insert card within the printed invitation package.
3. A trademark or logo of a donor/organization may **not** be used on a podium.

G. Invitation/Program Design and Copy

1. The style and text of the invitation, program, and handouts must be submitted to the Special Events Coordinator for approval in writing prior to final preparations for printing (i.e., the blue-line stage).
2. Because a Smithsonian museum is the co-host of the special event, all invitations are issued from the director of the individual museum and/or an appropriate Smithsonian official. The donor/organization is also represented by the title of the highest ranking representative of the co-hosting organization.

H. Invitation Guest List Policy

In order to provide background information to the museum director and to security staff, the donor/organization involved will be asked to provide the names and affiliations of guests prior to the event. This list will **not** be used for solicitation or publicity purposes.

The Smithsonian expects that any event held in a Smithsonian facility will comply with all applicable rules and regulations governing the attendance or participation of Members of Congress or their staffs in the event.

I. Promotional/Advertising Materials

1. The names of the Smithsonian Institution and its museums are registered trademarks and may not

III. Terms (continued)

- be used in any document without prior written approval from the museum's special events office.
2. Except as otherwise permitted in writing, the Smithsonian Institution does not allow or authorize the use of its name, or images taken from within its museums, to be used to promote or advertise products or services of any commercial organizations or contractors associated with the Institution, or donors to the Smithsonian.
 3. All printed materials and objects to be distributed, or visual presentations to be made, at special events must receive prior approval from the museum's special events office.
 4. Arrangements for press and broadcast media coverage of a special event must be handled in conjunction with, and approved by, the individual museum involved.
 5. Any printed, visual, or broadcast materials (e.g., brochures, advertisements, TV commercials, public service announcements, press kits, letterheads, press releases, banners, etc.) produced by the donor, by an organization acting on the donor's behalf, or by a co-hosting organization, which refer to the Smithsonian or its museums or programs, must be submitted to the museum's special events office for approval by the museum's Office of Public Affairs prior to use.
 6. Advertising and promotional materials may make no reference to specific corporate brands, products, or services, or make use of advertising slogans concerning products or services. The only exception is the case in which the company name and product are the same (e.g., Coca-Cola, Nike, and Xerox).
 7. The use of signage and banners inside Smithsonian museums must be approved by the museum's special events office. No banners may be used outside the museums.

III. Terms (continued)

J. Videotaping/Recording

1. The format and equipment associated with the still photography/videotaping/recording of an event must take into account the comfort level of guests and be approved in advance by the Special Events Coordinator. Cameras should be fully self-contained and use unobtrusive lighting.
2. Photographs and videotape footage of the individual museum may be used for archival and non-commercial corporate and institutional purposes only. These images may **not** be used for advertising, commercial, or promotional purposes. All use of cameras must be approved by the museum's special events office.

K. Catering Firms/Vendors

1. The Smithsonian Institution will provide co-sponsoring organizations with a non-inclusive list of suggested catering firms and other vendors, such as florists, beverage distributors, musicians, etc., which are familiar with the procedures and operations of the Smithsonian.
2. The selected catering firm/vendor is responsible for operating under the museum's catering guidelines.
3. The Smithsonian has final approval in the selection of the catering firm.
4. The catering firm/vendor must coordinate all arrangements and access to the individual museum through the Special Events Coordinator.
5. The co-sponsoring organization is fully responsible for the actions and compliance of all vendors and service personnel to the Smithsonian's special events operational procedures.
6. Insurance — The donor/organization will require its catering firm and other vendors to provide the Smithsonian with evidence of the limits of its

III. Terms (continued)

insurance, and will name the Smithsonian Institution as an —Additional Insured” party for the use of the facility. This evidence of insurance may be provided by a certificate of insurance, and must be received by the museum’s special events office at least one week prior to the event. Insurance coverage requirements are as follows:

- a. Commercial General Liability — \$1,000,000 per occurrence, including coverage for products liability and contractual liability
 - b. Liquor Liability Coverage — \$1,000,000
 - c. Automobile Liability Coverage — \$1,000,000 per accident for bodily injury and property damage
 - d. Workers’ Compensation — statutory limits
 - e. Large Groups — If there are more than 2,000 guests, the limit of liability increases to \$5,000,000 per occurrence
7. Indemnification and Hold Harmless Provision — In its agreement with the donor/organization, the catering firm/vendor must agree to indemnify and hold harmless the Smithsonian Institution and its museums from any and all claims, liability, costs, and expenses arising from any act or omission of the catering firm/vendor, its agents, or employees, including injury to the catering firm/vendor employees or agents, or to a third party, arising out of the use of the facility. The catering firm/vendor must provide the Smithsonian with a signed certificate to this effect. In addition, the donor/organization must provide evidence of this agreement.

Leftover Food — It is common practice that after larger events, with the co-sponsoring organization’s approval, arrangements are made with the caterer to distribute leftover food to the DC Central Kitchen, which delivers the food to area shelters and feeding programs.

III. Terms (continued) L. Guarantee

To avoid potentially embarrassing situations for both the co-sponsoring organization and the Smithsonian, security personnel are equipped with manual counters. The security staff will limit admittance to the event if the number of guests exceeds the number of guests confirmed for the museum 72 hours prior to the event and the stated guarantee to the caterer by 15 percent.

M. Liability and Insurance

Each non-Smithsonian organization will indemnify and hold harmless the United States and the Smithsonian Institution, their agents, and employees, against any and all damages, claims, or other liability due to personal injury or death, or damage to or loss of property of others, arising out of its use of Smithsonian Institution facilities. Non-Smithsonian organizations should maintain adequate insurance coverage during the term of the agreement for the use of Smithsonian facilities for a special event. See also Section K above.

N. Entertainment

Most forms of entertainment and dancing are permissible in Smithsonian museums, with prior approval from the Special Events Coordinator. Sound levels must be below 90 decibels.

O. Unanticipated Interruptions

The Smithsonian Institution will bear no financial responsibility for any disruptions that may occur due to mechanical difficulties, individual museum emergencies, or unanticipated events beyond the Smithsonian's control.

P. Force Majeure

If at any time during the term of this agreement, a cause or causes beyond the reasonable control of the parties hereto make(s) it illegal, impossible, or inadvisable by formal advice of a chief Government

III. Terms (continued) official (e.g., a declaration of emergency by a mayor, governor, or president) for the donor/organization to conduct the event at the Smithsonian, or for the majority of invitees to attend the event, the donor/organization may postpone the event without penalty.

These causes include, but are not limited to, disaster, acts of God, Government regulations, war, terrorism or threats of terrorism, civil disorder, labor trouble, strikes, curtailment of transportation facilities, unusually severe weather conditions, fire or casualty, or any other emergency.

If an event must be canceled, the event may be rescheduled for a mutually convenient date. Donations to the Smithsonian will not be returned.

CANCELLATION:	SD 401, March 9, 1995
INQUIRIES:	Office of Special Events and Protocol – Office of the Deputy Secretary/Chief Operating Officer
RETENTION:	Indefinite. Subject to review for currency 24 months from date of issue

MAIL MANAGEMENT

Purpose and Scope	1
Authorities and Citations	2
Policy	2
Determination of Proper Fund Source	3
Applicability	4
Definitions	4
Responsibilities	6
Units Authorized to Mail Directly	
with United States Postal Service (USPS)	7
Inter-office Smithsonian Mail	8
Determination of Correct Mailing Methods	9
Contractor (Third-party) Mailing	9
Reporting on Mailings Using Smithsonian	
Funds	9
Trust Fund Permits	9
Related Resources	10

Purpose and Scope

This Smithsonian Directive (SD) establishes and prescribes the policy and responsibilities for the appropriate use of U.S. Postal Service (USPS), contract (third-party) mailing, and inter-office mail services provided to the Smithsonian Institution by the Office of Facilities Management and Reliability (OFMR) in the Office of Facilities Engineering and Operations (OFE). This directive applies to all Smithsonian mailings, both federal and trust-funded.

This SD is to clarify and reinforce that all Smithsonian units are expected to use the most cost-effective service to fulfill their mailing requirements, and sets forth the general policies related to the Institution's mailing practices. The companion Smithsonian *Mail Services Guide* provides guidance, identifies correct mailing procedures and processes, and clarifies the identification and application of proper fund sources for the variety of mailings by all Smithsonian units.

Purpose and Scope
(continued)

The Mail Services Branch (MSB) of OFEO/OFMR provides mail service and guidance for federal- and trust-funded Smithsonian interests at all locations, including off-Mall sites in Massachusetts, New York, Florida, Arizona, California, Hawaii, and Panama. Additional information is contained in the “Definitions” section of this policy.

**Authorities
and Citations**

Smithsonian mail is processed in accordance with several statutes and regulations relating to mail management, including *Penalty and Franked Mail*, 39 *United States Code* (U.S.C.) 3202 (a)(1)(B); *Restrictions on Penalty Mail*, 39 U.S.C. 3204 (a)(b); *Cooperative Mailing Restrictions*, 39 U.S.C. 3627 (i); and *The Mailing Standards of the United States Postal Service, Domestic Mail Manual*, Issue 300 (July 15, 2007), as periodically amended.

Determination of the correct mailing processes and procedures relies on the USPS terms and definitions as the authoritative source. The Postal Service generally holds that the agency determines which matters relate solely to its own business, and states that “cases of questionable use must be referred to the agency.” OFMR, working in conjunction with the Office of General Counsel (OGC), determines proper mailing methods and fund sources.

Policy

1. The Institution shall use all funds, regardless of the source, consistent with best practices for the federal and/or non-profit sectors, and in the most cost-effective and reasonable manner possible. The Smithsonian shall be guided by the principles of the federal sector in the conduct of its mailings and associated activities whenever appropriate. When mailing is not appropriate for federal funding, the Institution shall follow the non-profit sector principles and best practices for fiduciary stewardship.
2. The Institution shall establish and maintain appropriate accounting and internal controls to ensure the legality, reasonableness, and

Policy (continued)

appropriateness of all mailing and related activities payments and expenditures.

3. Each use of Smithsonian funds shall constitute a "necessary expense." A necessary expense is an allowable expenditure that has an obvious and legitimate connection to the Institution's mission.
4. The primary purpose of all Smithsonian mail is to benefit the Institution.

**Determination
of Proper Fund
Source**

Before sending any official mailings from the Smithsonian, the responsible office must determine the correct source of funds to pay for the mailing. Information determining the most appropriate means for mailing Smithsonian correspondence is contained in the *Mail Services Guide* (<http://ofeo.si.edu/offices/ofmr/mss/mail/mailservicesguide.pdf>).

This policy is to clarify and reinforce to all Smithsonian users that the proper determination of the source of the mailing funds can only be made in light of the materials being mailed. This policy determines the appropriate fund source and method of mailing from this point forward.

Federal Funds		Trust Funds	
<i>Acceptable Use</i>	<i>Unacceptable Use</i>	<i>Acceptable Use</i>	<i>Unacceptable Use</i>
Materials produced by federal programs, including bulk volume	Mailings whose purposes are the solicitation of fees or other revenue	General mailings for distribution, including bulk volume	Personal mail, personal bills, and personal e-commerce transactions
Official Smithsonian administrative correspondence	Personal mail, personal bills, and personal e-commerce transactions	Mailings whose purposes are the solicitation of fees or other revenue	

Applicability

All Smithsonian units (museums, research centers, and offices), including all subordinate organizations, are subject to the provisions of this directive.

Definitions

To better make determinations as to the correct source of funding and process to be applied to Smithsonian mailings, the following terms must be clearly understood and applied to the determination:

- **Official mail** — Official mail is not defined in statute or in the USPS rules; each entity is responsible for determining what its official mail is. Official mail includes, regardless of source of funding, but is not limited to: administrative correspondence related to operations of a Smithsonian office; correspondence sent in response to a specific request for information; and newsletters or brochures about Smithsonian activities that are solely informational in purpose. Every expenditure of Smithsonian funds for official mail must be prudent, directly benefit the Institution, and meet the necessary expense rule. Personal mail, personal bills, and personal e-commerce correspondence is not official mail and may not be sent out at Smithsonian expense.
- **Indicia mail** — Markings on a mail piece showing that postage has been paid by the sender.
- **Indicia markings** — Postage stamps, meter marks and facing identification marks (FIM) or bars are considered indicia by the USPS, as are images and/or text pre-printed on mailing envelopes in place of a stamp and/or printing in the upper right corner of an envelope or general mailing label.
- **Penalty mail** — Official mail authorized by federal law to be transmitted without prepayment of postage for use exclusively by the federal Government for official business. The term “penalty” refers to “Penalty for Private Use \$300.”
- **Penalty Mail System (PMS)** — Used with penalty meter indicia, penalty permit imprint indicia, penalty

Definitions
(continued)

business reply indicia and Express Mail, and enables participating agencies to achieve total official mail accountability. PMS stamp stock, stamped cards and stamped envelopes are available for official use only by authorized Government agencies.

- **Solicitation mail** — Unless otherwise authorized, solicitation mail (regardless of source of funding of the program or project supported by the mailing) is mail whose primary purpose is the solicitation of money, obtaining money, or the generation of trust funds, above cost, for the promoted or offered product or service.
- **First-class mail** — Letters, postal cards, written matter, bills, statements of account, business reply mail and all matter sealed against inspection. Cost is determined by size and weight of mailing.
- **Discount mail** — The best option for volume mailings (minimum 500 pieces) where each piece weighs less than 13 ounces. Cost of each piece is determined by the characteristics of the piece.
- **Standard mail** — Bulk prices for mailings that meet a minimum quantity of 200 pieces or 50 pounds of mail. Standard mail should be used to send: printed matter, flyers, circulars, advertising, newsletters, bulletins, catalogues, media material, library material, and small parcels.
- **Contractor mailing** — Large volumes of mail that a commercial firm prints or prepares for mailing and then takes to be mailed directly to the post office, with the firm acting as the Smithsonian's mailing agent.
- **Department of State International Cooperative Administrative Support Services (ICASS)** — The ICASS system is the principal means by which the U.S. Government provides and shares the cost of common administrative support needed to ensure effective operation at its diplomatic and consular

Definitions
(continued)

posts abroad. ICASS is a revenue-neutral system in which more than 250 agencies and offices receive bills for shared services. ICASS mail is used in correspondence with Smithsonian units in Panama, as well as in official Smithsonian correspondence with foreign nationals.

- **International Mail (that is not ICASS)** — Mail that is sent to a foreign destination in a manner consistent with requirements specified in the *International Mail Manual*.
- **Private or Non-USPS Express Mail** — Commercial companies which perform express, ground delivery or other mailing services for a fee that is paid by the unit responsible for requesting or benefiting from the service (e.g., UPS, FedEx, DHL, etc.). The Office of Contracting and Personal Property Management (OCon&PPM) negotiates and effects agreements with mail service companies for rates beneficial to the Institution. Mail service provider agreements shall be announced SI-wide as they are entered and included on the Blanket Purchase Agreements listing available on the OCon&PPM Prism website.
- **USPS-OMAS (U.S. Postal Service — Official Mail Accounting System)** — The system of the USPS that tracks federal mail by the following categories:
 - Pre-sort First Class
 - Bulk Third-Class
 - Meters
 - Business Reply Mail
 - Merchandise Return
 - Postage Due
 - Printed Envelopes
 - Penalty Mail Stamps
 - Express Mail
 - Fees paid

Responsibilities

OFEO — Oversees the mailing operations and process of the Smithsonian Institution through the Mail Services Branch (MSB) of the Office of Facilities Management

Responsibilities
(continued)

and Reliability (OFMR). OFEO/OFMR is responsible for ensuring that the Smithsonian uses the most cost-effective and efficient method of mailing Smithsonian correspondence.

Smithsonian Offices — It is the responsibility of the office mailing correspondence to consult the *Mail Services Guide* to identify and use the appropriate funding and method of mailing. This will ensure the Smithsonian resources are correctly, prudently and effectively utilized.

Authorized Direct Mailing Unit — Smithsonian offices that have their own SI mailing machines and are authorized to post their official postage indicia directly to their outgoing mail with USPS. These units are identified below.

Contractor/Third-party Mailing — Smithsonian offices using a contractor to design the mail piece and provide appropriate postage indicia. The contractor must provide the mailing unit with the appropriate form and information. A description of this process can be found in the Smithsonian *Mail Services Guide*.

**Units Authorized
to Mail Directly
with USPS**

In order to ensure the accuracy of comprehensive Smithsonian postal records and costs, all Smithsonian units are required to submit and process USPS mail through the OFEO/OFMR Mail Services Branch with the following exceptions noted below. These offices may mail directly with the U.S. Postal Service because of their locations off of the Washington, DC Mall or because of the time-sensitive nature of the correspondence to be sent:

- Archives of American Art (New York, NY)
- Cooper-Hewitt, National Design Museum (New York, NY)
- National Zoological Park (Washington, DC)

**Units Authorized
to Mail Directly
with USPS**
(continued)

- National Museum of the American Indian, Gustav Heye Cultural Resource Center (New York, NY)
 - Smithsonian Conservation Biology Institute (Front Royal, VA)
 - Smithsonian Astrophysical Observatory (Cambridge, MA; Mount Hopkins, AZ; and Hilo, HI)
 - Smithsonian Environmental Research Center (Edgewater, MD)
 - Smithsonian Marine Station (Fort Pierce, FL)
 - Smithsonian Tropical Research Institute (Panama)
 - Stephen F. Udvar-Hazy Center (Chantilly, VA)
 - Smithsonian Center for Folklife and Cultural Heritage (CFCH)
 - Smithsonian Office of Advancement (OA)
 - Smithsonian Enterprises (SE)
-

**Inter-office
Smithsonian Mail**

Mail pouches are clearly identified envelopes used to consolidate mail for dispatch to various offices throughout the Institution. Those items dispatched to Washington, DC, Maryland, and Virginia locations do not need any postage.

Mail Routing Codes (MRCs) are used to identify specific Smithsonian locations for the delivery of official mail; the MRC is a minimum three- (3-) digit numerical identification number.

Each Smithsonian facility has a clearly identified mail pick-up/drop-off location(s) that serve(s) as the pick-up and delivery location for USPS and inter-office correspondence and parcels that are delivered daily.

The Mail Services Branch of OFEO/OFMR is located at 3400 Pennsy Drive in Landover, Maryland.

**Determination
of Correct Mailing
Methods**

After determining the correct source of funds to pay for a mailing, the next decision by the mailing unit is determining the correct mailing methodology to provide the Smithsonian Institution with the best value. Information to support the correct mailing methodology can be found in the Smithsonian *Mail Services Guide*.

**Contractor (Third-
party) Mailing**

Contractor mailing is usually used for mail pieces designed by the mailing house under contract to the Smithsonian Institution and providing appropriate postage indicia on the mailing. The contractor acts as the Smithsonian's mailing agent and provides mailing preparation and execution on behalf of the Smithsonian Institution.

The contractor provides the mailing unit with the appropriate mailing form(s) and information. Every mailing must have valid procurement documentation in place *prior to* the mailing.

**Reporting
on Mailings Using
Smithsonian Funds**

Units authorized to mail directly with the U.S. Postal Service because of their locations off of the Washington, DC Mall, or because of the time-sensitive nature of the correspondence, are periodically required to prepare a variety of reports in accordance with requirements specified by MSB. These reports provide mail volume information used to determine accurate costs and assist with cost projections. SE units will help ensure the accuracy of comprehensive Smithsonian postal records and costs by preparing a semi-annual report for OFEO/MSB, each February and August, which contains direct mail and fulfillment center postal costs and trust fund permit information for the previous reporting period.

Trust Fund Permits

The OFMR/MSB is responsible for maintaining documentation of all nonprofit bulk mailing permits. All permit applications and permits must be in the name of the Smithsonian Institution, not the individual unit, and must be reported to OFEO/MSB on a semi-annual basis.

Trust Fund Permits
(continued)

Prior to the submission of any permit application to the United States Postal Service, the permit application must be submitted to the OFMR/MSB. However, if the permit is required for a time-sensitive mailing, it must be included in the semi-annual report to the OFMR/MSB instead.

Related Resources

- Smithsonian *Mail Services Guide* at <http://ofeo.si.edu/offices/ofmr/mss/mail/mailservicesguide.pdf>
- General Counsel Memo dated June 22, 2005
- Smithsonian Mail Services Branch website at <http://ofeo.si.edu/offices/ofmr/mss/mail/index-mail.asp>.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 402, November 8, 2005
Office of Facilities Engineering and Operations (OFEO)
Indefinite. Subject to review for currency 24 months from date of issue.

DENYING PUBLIC ACCESS TO SMITHSONIAN PROPERTY

Purpose	1
Policy	1
Authority	2
Scope	2
Prohibited Conduct	2
Factors	3
Procedure	4

Purpose

Smithsonian Institution (SI or Smithsonian) buildings and grounds are unique community resources to be enjoyed by everyone. The Smithsonian offers access to collections, research, programs, and exhibits, as well as buildings, and welcomes the visiting public. There are instances in which people may be requested to leave and/or be administratively barred from entering a building or its grounds. Such actions are necessary to protect property, employees, and visitors or to otherwise ensure orderly operations on Smithsonian premises. This Smithsonian Directive (SD) establishes policies and procedures for barring persons from Smithsonian buildings and grounds.

Policy

The Office of Protection Services (OPS) may issue barring notices to the general public, prohibiting their admission onto public areas of SI buildings and grounds in whole or in part.¹ Prohibiting any person(s) from entering the buildings or grounds of the Smithsonian is a serious decision, impacting an individual's right of access to a public facility, that should never be taken without thorough consideration and review of all relevant factors in each circumstance.

¹ The procedures in this Smithsonian policy are distinct from any court-issued order.

Authority	Pursuant to 40 <i>United States Code</i> (U.S.C.) § 6306, Smithsonian special police officers may, within Smithsonian buildings and grounds, enforce, and make arrests for violations of 40 U.S.C. §§ 6302 and 6303, any regulation prescribed under 40 U.S.C. § 6304, federal or state law, or any regulation prescribed under federal or state law.
Scope	This SD only applies to the general public entering and already in SI buildings and grounds and, absent exceptional circumstances, is not applicable to SI employees or affiliated staff as part of any disciplinary action for misconduct.
Prohibited Conduct	<p>Smithsonian regulations prohibit the following, among other things, within SI buildings and grounds:</p> <ul style="list-style-type: none">• [W]illfully ... destroy[ing], damage[ing], or remov[ing] [Smithsonian] property or any part thereof (36 <i>Code of Federal Regulations</i> [CFR] § 504.3);• [C]arry[ing] firearms, other dangerous or deadly weapons, or explosives, either openly or concealed [on the premises], except for official purposes (36 CFR § 504.14);• The use of loud, abusive ... language; unwarranted loitering, sleeping or assembly; the creation of any hazard to persons or things; improper disposal of rubbish; spitting; prurient prying; the commission of any obscene or indecent act, or any other unseemly or disorderly conduct on the premises; throwing articles of any kind from or within a building; or climbing upon any part of a building ... (36 CFR § 504.5);• [T]he operating of a motor vehicle thereon by a person under the influence of any intoxicating beverage or narcotic drug or the use of such drug in or on the premises ... [and] [c]onsumption of intoxicating beverages on the premises ... unless officially authorized (36 CFR § 504.7);

Prohibited Conduct
(continued)

- Participating in games for money or other personal property or the operation of gambling devices, the conduct of a lottery or pool, or the selling or purchasing of numbers tickets in or on the premises ... (36 CFR § 504.6);

See 36 CFR § 504 et seq.

In addition to the above, Smithsonian Building and Grounds Regulations of the National Zoological Park provide for the protection of Zoo animals:

- Except for official purposes, no person shall: (a) Kill, injure, or disturb any exhibit or research animal by any means except to secure personal safety; (b) Pet, attempt to pet, handle, move, or remove exhibit or research animals; (c) Feed exhibit or research animals, except in strict accordance with authorized signs; (d) Catch, attempt to catch, trap, remove, or kill any free roaming animals inhabiting the premises ... (36 CFR § 520.4).

See 36 CFR § 520 et seq.

Factors

Violation of one or more of the regulations above constitutes misconduct that may warrant a verbal warning by OPS personnel, a request to cease and desist the misconduct, and/or a request to leave the SI buildings or grounds immediately. Additionally, serious or repeated misconduct may be grounds for barring the person from SI buildings and grounds.

The duration of the barring period shall be no more than one year, absent exceptional circumstances. The barring notice may be renewed by OPS if circumstances warrant, consistent with the procedures contained herein.

The decision to bar a person from SI buildings and SI grounds shall be based on an individualized assessment of the nature and circumstances of the misconduct.

Factors (continued)

Factors which will be considered in determining whether barring is appropriate, as well as the duration and scope of the barring, are:

- (1) The nature and severity of the misconduct;
 - (2) Whether the misconduct impacts the safety of Smithsonian employees, visitors, or property/collections;
 - (3) The extent of damage or disruption caused by the misconduct and the impact of repetition of such misconduct;
 - (4) A history of prior misconduct;
 - (5) The individual's cooperation with OPS personnel after being informed to cease the misconduct; and
 - (6) Other relevant circumstances, including any mitigating factors.
-

Procedure

A decision to bar a person from SI buildings and grounds for serious or repeated misconduct may only be made by the Director, OPS, or his/her designee after consulting with the Office of General Counsel.

Once it is determined that a person should be barred, a written notice that indicates with specificity: (1) the identity of the person being barred; (2) the reason for the barring, including citing the regulation(s) violated; (3) the extent and duration of the barring; and (4) the appeals process, shall be prepared and issued to the individual.

The barring period shall begin on the date the individual is served with the barring notice.

Any person barred from SI buildings and grounds may appeal the decision to the Director, Office of Facilities Engineering and Operations (OFEO), by submitting a written notice of appeal within 15 days after receipt of

Procedure
(continued)

the barring notice, stating the grounds upon which the individual contends the decision should be modified or reversed and providing any information in support of his/her request. The Director, OFEO, shall respond in writing to the appeal, and may affirm, modify, or reverse the barring. The barring notice remains in effect while the appeal is pending.

An individual found in violation of the conditions outlined in the barring notice may be subjected to arrest for unlawful entry.

CANCELLATION:
INQUIRIES:

Not applicable.

Office of Protection Services (OPS), Office of Facilities Engineering and Operations (OFEO).

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue.



SMITHSONIAN DIRECTIVES TRANSMITTAL

April 29, 1992

TO: Heads of organization units

SUBJECT: OM 781(R), Printing, Duplicating and Photographic
Services - Revised Edition

Office Memorandum 781 has been revised to provide current information about the responsibilities and functions of the Office of Printing and Photographic Services and establishes policies and procedures for obtaining the support it provides to Smithsonian units and activities. Please replace all earlier issuances of OM 781 with the attached revision.

The recently-revised OM 707(R), Handling outside Permission Requests to Use Smithsonian Images, and OM 756(R), Policies and Procedures Covering OPPS Photographic Sales and the Processing of Permission Requests by OPPS, are closely related in subject matter to this office memorandum and may be of assistance.

Suttonfield
Suttonfield
Assistant Secretary for
Finance and Administration

CANCELLATIONS: All earlier issuances of OM 781.
INQUIRIES: Office of Printing and Photographic Services
RETENTION: Indefinite. This OM is subject to review for
currency 18 months from the date hereof.
FILING: File this OM in numerical sequence with other
INSTRUCTIONS: current Office Memoranda.
COPIES: Copies of this Office Memorandum may be obtained
through the Office of Financial and Management
Analysis.



SMITHSONIAN INSTITUTION

OFFICE MEMORANDUM 781(R)

April 29, 1992

PRINTING, DUPLICATING AND PHOTOGRAPHIC SERVICES

1. FUNCTIONS AND RESPONSIBILITIES. The Director, Office of Printing and Photographic Services, is responsible for developing plans to meet current and long-term needs of certain Smithsonian bureaus and activities for printing, duplicating, and photographic support; establishing appropriate operating policies and programs to meet these needs; and directing the operations of printing and photographic services in an effective manner.

2. ORGANIZATIONS AND LOCATIONS. OPPS provides its photographic services through operating branches organized under the Photographic Division. The Duplicating Branch provides duplicating services. In addition, the OPPS Services Branch maintains the OPPS Photographic Collection in its cold storage facility; and provides services for sales of OPPS photographs to the public.

A. Duplicating Branch. Located at the SISC, 1111 North Capitol Street. Services provided are photo composition, offset printing, collating, binding, stapling, folding, envelope-stuffing, sealing, packaging, and paper cutting. Direct requests for printing and related needs to the Duplicating Branch, SI Service Center, using the SI-2668, "Printing and Duplicating Request," see Exhibit A. See Exhibit B, Duplicating Pick-up and Delivery Schedule, for details of a scheduled pickup and delivery system.

(1) Limitation on duplicating requests. The Congressional Joint Committee on Printing imposed the following limitations, which apply, as a matter of Smithsonian policy, to the duplicating needs of both federal and trust funded users. No more than 5,000 printed impressions will be run of any single page, or no more than 25,000 impressions for any single job. The Duplicating Branch will not accept large orders, broken into smaller parts to evade these limits.

B. Photographic Division. Services include original photography, either on-site or in OPPS studios; black & white film processing, black & white printing; copy photo-reproduction; E-6 color transparency film processing; duplication of transparencies and slides; and art work reproduction onto color film. Direct requests for photographic services to the Production Control Office, OPPS, CB054, NMAH, using the SI-800 "Requisition for Photographic

Services." Exhibit C is a sample of the SI-800. The services provided by the various operating branches of the Photographic Division are described as follows:

(1) Museum Branches Are Located:

National Air and Space Museum
National Museum of Natural History
Museum Support Center

These branches serve the photographic needs of the staff of these museums and organizations, including original photography of museum objects and events and associated black & white laboratory services.

(2) Color Branch. This branch is located with the central OPPS offices in the Museum of American History. It provides Institution-wide services to support the color slide and transparency needs of bureaus and offices. The Branch:

- Reproduces color transparencies, slides and art work on E-6 (Ektachrome) color film.
- Processes E-6 film taken by other branches of the Photographic Division and official film from Smithsonian offices. On request and on a time available basis, performs special processes to modify normal film ASA ratings.
- Photographs two-dimensional art work and some small objects.
- Designs and photographs special effects, titles, and other forms of color optical art.

NOTE: The Production Control Office will arrange for the purchase of color printing and other processes beyond the capabilities of the Color Branch, with the cost charged to the requestor's federal or trust allotment, as appropriate. For short delivery times, please make advance arrangements.

(3) Special Assignments/Photography Branch. This branch is located with the central OPPS offices in the Museum of American History. In addition to providing original photography to NMAH, it serves the needs of bureaus and activities not supported by one of the museum branches, such as the central SI administration, Office of Public Affairs, Special Events, etc. Its services include original photography; and black and white laboratory services such as film processing, printing, etc. Also

included is photographic work for special exhibitions, publications, historic documentation of current events and other projects. Finally, the branch provides support to the museum branches for special projects beyond their respective capabilities.

(4) B&W Laboratory Branch. This branch is located with the central OPPS offices in the Museum of American History. This branch serves Institution-wide needs for black & white photographic printing, the photographic copying from art works, photographs, books, and other documents. It also serves the Duplicating Branch's graphic arts requirements for halftones, line negatives, and other products related to the reproduction of photographs.

- Cellulose Nitrate Negatives - In addition, this branch serves Institution-wide needs to assist in the identification and conversion of cellulose nitrate negatives to safety film. Nitrate negatives deteriorate with age, and lose their image quality. They can do serious harm to other materials with which they are stored, and create a significant fire hazard. OPPS will convert limited amounts of nitrate negatives without cost. Bureaus are charged for large amounts, or OPPS will assist in locating an outside vendor. OPPS can provide assistance in helping bureaus to identify nitrate film. Bureaus and offices should carefully screen all materials for conversion to safety film to ensure their contents warrant the expense required.

(5) Smithsonian Tropical Research Institute Branch. This branch serves the photographic needs of the staff of STRI, including original photography to support scientific research programs, and events; and associated black & white and limited color transparency laboratory services.

(6) Electronic Imaging Branch. This branch is located with the central OPPS offices in the Museum of American History. This branch can provide limited scanning of photographs for conversion to electronic form. This branch also provides digital images for use with on-line network services, desktop publishing applications and transmission to newspaper wire service receivers.

C. Services Branch. This branch is located with the central OPPS offices in the Museum of American History. The branch has dual functions as a repository of film negatives,

and for the handling and sale of photography to the public and other outside requestors. The branch:

- Maintains the OPPS photographic collection in a photographic library to provide a central file of historic and current negatives and transparencies in an environmentally controlled area.
- Produces and maintains a catalogue of photographs for both internal Smithsonian users and the general public.
- Serves as a single point of contact for publishers, educators, and the general public to purchase photographs held by OPPS. The branch coordinates such requests with curatorial staff as appropriate, and ensures the inclusion of copyright or other restrictions as well as photo credits. See OM 756(R), Policies and Procedures covering OPPS Photographic Sales and the Processing of Permission Requests by OPPS, for further information.
- Develops photographic products for sale.

3. LIMITATIONS ON PHOTOGRAPHIC REQUESTS. In order to meet the most important needs of all the bureaus and activities served, the following guidelines govern requests for photographic support. Large orders may not be broken into smaller parts to evade these limits. Arrange other methods by contacting the Production Control Officer, OPPS. Acceptance of photographic work requiring additional justification, as with other requests, is the responsibility of the Production Control Officer. In cases of urgent or special need, refer requests denied by Production Control to the Director, OPPS.

A. Additional written justification (signed by the requestor and by an authorized approving official) is necessary for the following requests.

(1) Fifty-one or more prints or duplicate slides for any work order (Office of Public Affairs excepted).

{2) Any prints or duplicate slides from gallery openings, receptions, symposia, meetings, etc. Unless for publication purposes, prints and slides are not made as give-aways for participants. Charges will be made for such prints or slides.

{3) Four or more prints or duplicate slides or transparencies from any single image. Units will be charged in such cases.

B. Additional telephone justification is necessary for requests specifying:

(1) A due date of less than three weeks. This restriction does not apply to E-6 processing and mounting which normally requires 3-5 working days.

(2) Prints from all or most frames of a contact proof sheet. In these cases, the Production Control Officer will contact the requestor to arrange payment and/or reduce the original order.

4. COMMERCIAL PROCESSING, OVERTIME, REIMBURSEMENTS. When a requestor agrees to commercial processing or overtime for OPPS staff in order to complete work, the costs of these services are paid by the requestor's organization. There is a two-hour minimum per person for such overtime. The SI-2668, "Printing and Duplicating Requests," (Exhibit A); or SI-800, "Requisition for Photographic Services," (Exhibit C) should include such requirements. The current rate for overtime charges for printing and photographic services is in Exhibit D, Current Rate for Overtime Changes.

A. If OPPS is reimbursed for overtime or large requests, OPPS prepares the SIFL-2601, "Reimbursement for Overtime Services provided to SI Units". This is attached to the SI-2668, or SI-800. OPPS sends the original set of these documents to the Office of Accounting and Financial Services, OAFS, for the transfer of funds, with a copy to the requestor. Exhibit E contains a sample of the SIFL- 2601.

B. If commercial photographic vendors are involved, OPPS prepares an SI-820, "Outside Services", outlining requirements to a vendor as specified on the requestor's SI-800. A sample of the SI-820 is in Exhibit F. After return of the work by the vendor, OPPS transmits a request for payment to OAFS at the end of the month. OAFS charges the requesting organization's funds directly using invoices from vendors.

Toucan Business Forms

SMITHSONIAN INSTITUTION PRINTING AND DUPLICATING REQUEST											
SI-2668, R-6-21-al ass Stock No. 754-114											
PART I -					b Orgn Requisition No		c Date dMtrd				
TO: Chief Duplicating Branch SISC 1111 N Capitol St..					FOR DUPUCATING USE ONLY						
d Tottle or description of work (<i>•tt•ch origin•# copy, DotOt st•ple or fold</i>)					Form Number (if <i>•pplic•ble</i>)		e. No pagM		f no copiM g Total		
PART II Paper stock and ink											
(1) Kind of paper				(2) Color			(3) Ink		(4) Trim Stze desired		
Stock		Other		White		Black					
Body				Other		Qther					
Cover											
b Servoce(s) desored											
(1) Print			(2) Compositoon			(3) Bindery operations					
Onesode			Photo Composotton			Holepunch: Top		Two holes		J Small holes	
Both Sides			Proofs			left		Three holes		Itarge holes	
(3) Bondery Operations											
Staple: One up left		Bind: Spiral		Fold: One(1)		Collate:		Other			
Two left		Pad		Two(2)		As paged		Stuff			
Saddle-stitch		Veto		Three(I)		Other		P ckage			
(4) SpecoallInstructions:											
PART III. Authorization and Approvals											
a. Name and phone number of indivodual to contact concerning thos request					b For delivery to: (N tme) (Unot) (Bldg) (Room)						
Title tnd sogn ttture of authorozing officoal				Date		Approval for processong by (hoe f Duploc ttong Branch •9			D tte		
FOR DUPLICATING BRANCH USE ONLY											
Soqn ture		Work	Tome In	Tome Out	MonthiDdy	Soqn nure		WQrk	Tome In	Tome Out	MonthiD y
Soqndture		Worlc	Tome In	TimeOut	MonthiD ty	Soqn ture		Work	Tome In	Tome Out	Month t0dy
Rece-ved by (Cusromt>r or r'prt>senfd(ove s>gn re)										D te	
Instructions and information for customers are contained in User's Handbook											

DUPLICATING PICK-UP

BUILDING	ROOM NUMBER	TIME
MNH	63A	10AM
MAH	CB054	10:25AM
A & I BLDG.	2410	11:00AM
S.I. BLDG.	2ND FL. NEAR SECY. COPY ROOM	11:15AM
L'ENFANT	7500 (SPECIAL PICK-UP FROM OHR TUES. & THURS.)	11:30AM
NASM	3510	1:30PM
A & I BLDG.	2410	2:15PM
S.I. BLDG.	2ND FL. NEAR SECY. COPY ROOM	2:40PM
L'ENFANT	7500	3:00PM
MAH	CB054	3:20PM
HMSG	4TH FLOOR FRONT DESK WHEN CALLED	

INSTRUCTIONS: <i>PREPARE IN TRIPPLICATE</i> Furnish aU information: Requester, Unit, Unit Code, Building, Room and Telephone Number. Approving Official will signify by their signature that funds are available for the requested work. <i>Specify "Date Due" only if matedal is required in less than 15 working days (see S.I. Office Memo 756).</i> Send to MAHCB054. For further information call 357-2303.		OPPTS 1.0.NUMBER	
Requested By:		Due Date:	
Unit		Approving Officer's Sign ture	
Room Number Building		Fund Number <input type="radio"/> Federal <input type="radio"/> Trust	
Description of Services Required:		Unit Code	
Telephone Number		Unit Code	

[illegible]

The above listcci materials were received by OPPS on _____19 u-bY

signature

The above listed materials were returned to _____ signature

signature

_____ from 01'15 on _____ 19____
division

S1-800
Rev 6-22-82
OSS Supply Item # 754-55

Copy 1 lwhitei-Remaim with job; Copy 2 lcanaryJ-Su>(l,nso File; Copy 3 (pinkI-Aetu<n to ruquast"r

OFFICE OF PRINTING AND PHOTOGRAPHIC SERVICES

CURRENT RATE FOR OVERTIME CHARGES

The current overtime rate for photographic or duplicating services is \$35.00 per hour for Smithsonian users. There is a two-hour minimum for overtime.

Memo

DATB:

PROM: **Jill** Wallace, Director
Officof Printing and Photoqraphic services

TO ■ Office of AccountingFinancial Services

SUBJ: RBDIBUJUIBKRT POR SBRV:tCES PROV:tDED TO S:t TS

TRABSPBR: _____

Job No. _____

PROM: _____

TO: (circle one line)

82289000-850000-525-90 (Federal fund - Duplicating)

11280002-R10000-525-90 (Trust fund - Duplicating)

82289000-840000-525-90 (Federal fund - Photographic)

28284000-R10000-650-50 (Trust fund - Photographic)

Attached is the original copy (dt copies) of the s:t-800,
"Requisition for Photoqraphic services", or s:t-2668,
"Printing and Duplicating Request", with the authorizing
official's signature for the above funds.

OFFICE OF PRINTING AND PHOTOGRAPHIC SERVICES
SMITHSONIAN INSTITUTION Washington, D. C. 20560

SI 810
Rev 11-16-85

OUTSIDE SERVICES

* REFERENCE NO. _____

COMPANY _____

DATE _____

Contract No. _____

Job Order No. _____

Fund No. _____

Requested by _____

D URGENT

D ROUTINE

Due date _____

Unit _____

ENCLOSURES

Type and amount of materials:

SERVICES REQUESTED

Specify type, quantity, size, texture, weight, etc.:

NOTE TO COMPANY

RETURN THIS ORDER WITH MATERIAL TO PRODUCTION CONTROL OFFICE, PRINTING
AND PHOTOGRAPHIC SERVICES, SMITHSONIAN INSTITUTION, Room CB-054, AMERICAN
HISTORY BUILDING, 12th & CONSTITUTION AVENUE, N.W., WASHINGTON, D.C. 20560.
FOR FURTHER INFORMATION CALL 357-2303 (MARY ELLEN McCAFFREY).

*ON YOUR INVOICE USE REFERENCE NO. IN UPPER RIGHT HAND CORNER.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 410,

April 27, 2005,

Date Last Declared Current: February 28, 2011

FACILITY CONSTRUCTION AND IMPROVEMENT PROJECTS

Purpose	1
Responsibilities	2
Procedures for Obtaining Services	5
Additional Information	5

Purpose

This directive establishes authorities and responsibilities associated with the facilities building program as delegated by the Secretary of the Smithsonian Institution.

The Director, Office of Facilities Engineering and Operations (OFEO), is the designated Smithsonian code official who is delegated the responsibility for the planning, real estate management, design and construction services of the Smithsonian Institution. All facility-altering projects are managed by or through OFEO. This is applicable to all units, museums, and other Institution organizations.

This directive is to ensure an appropriate level of quality standards to:

- maintain the safety, health and welfare of Smithsonian visitors and staff;
- protect, preserve, conserve, and secure the Smithsonian collections;
- support the special needs of scientific programs;
- preserve the Smithsonian buildings and their historic integrity;
- assure that all construction is coordinated and tracked through a central source; and
- promote accurate record keeping.

Responsibilities

OFEO provides leadership for all Institution facility programs. OFEO provides consultation to the Secretary, Deputy Secretary, Under Secretaries, Smithsonian organization units, government organizations, and other museums on facilities matters. OFEO responsibilities are as follows.

The **Office of Engineering Design and Construction (OEDC)** is responsible for project implementation strategy, design and execution for all new construction and repair projects at Smithsonian facilities. The Director of OEDC is charged with identifying and ensuring compliance with the appropriate codes and regulations that serve as minimum design standards for all Smithsonian facilities. In addition, the Secretary has designated the OEDC Director as Chairperson of the Architect-Engineer Evaluation Board. This Board recommends the selection of Architect/Engineer firms or individuals to the Contracting Officer for contract award and carries out the delineated functions under Part 36 of the Federal Acquisition Regulations Subpart 36.6 dated July 23, 1990.

Within OEDC, specific responsibilities include the following:

- The Engineering & Design Division (EDD) provides architectural and engineering services for facility construction, renovation, and repair. This includes developing scopes of work for design services. EDD oversees contracted design efforts and is responsible for ensuring thorough project reviews and code/standards compliance for all physical plant construction and improvement projects. EDD also provides limited in-house design resources for small projects.
- The Construction Management Division (CMD) provides construction administration services and operates construction field offices at large project sites. CMD directs and oversees the activities of construction contractors, coordinates those activities with museum representatives, provides construction management services, and is involved in contract change order negotiations and approving payments.

Responsibilities
(continued)

- The Cost Engineering Division (CED) provides cost estimates for projects at the development stage and provides revised cost estimates throughout the project life cycle to reflect changes and current market conditions.
- The Geo-Spatial Conversions Divisions (GSCD) consolidates and maintains Computer-Aided Design Drawings (CADD) and Electronic Document Management Systems (EDMS) for SI facilities and provides a single source for facility documentation, including construction drawings, specifications, shop drawings, and an approved as-built drawing capability for facilities management and project development.

The **Office of Planning and Project Management (OPPM)** administers the capital renewal program by providing comprehensive management of the Institution's Facilities Capital Program. OPPM monitors, directs and reports on the scope, budget, and schedule of individual projects, and coordinates the efforts of stakeholders, design and construction teams. For all projects, OPPM develops program requirements, then bundles, packages, and prioritizes them. For major projects, OPPM ensures that the scopes are well defined through the use of the Project Definition Rating Index and is responsible for fiduciary management of project funds for the duration of the project. OPPM also provides facilities master planning and is a point of contact for interagency review and approval processes for the National Capital Planning Commission, Commission of Fine Arts, and Section 106 requirements of the Advisory Council on Historic Preservation. The OPPM Director assigns a project manager to each major organization unit or group of units to coordinate and manage all physical plant projects.

The **Office of Safety and Environmental Management (OSEM)** is responsible for fire protection, life safety, and occupational safety and health, as well as ensuring that environmental codes, standards, and policies are fully implemented. OSEM provides technical support and reviews projects in accordance with SD 419 and the SI *Safety Handbook*.

Responsibilities
(continued)

The **Office of Facilities Management and Reliability (OFM&R)** is responsible for providing museum support services in the Washington metropolitan area through eight zoned building management units, a business management unit, and a systems engineering unit. OFM&R staffers, under the direction of zone managers (assigned by the OFM&R Director to each major organization unit or group of units) and facility managers, provide routine maintenance and minor repairs and more complex maintenance and repairs that require contracting support. OFM&R also provides technical support and reviews projects for operability and maintenance to ensure compliance with established standards.

Within its business management unit, OFM&R provides energy management services, a work management center, a central repair shop, horticulture services, and other support services. Within the systems engineering unit, OFM&R provides building systems engineering, reliability-centered maintenance, and facilities assessment.

The **Office of Protection Services (OPS)** is responsible for security and protection of staff, visitors, collections, and buildings. The OPS provides technical support and reviews projects to ensure that adequate security is provided.

The **OFEO Resources Management Group** provides facility project budget advocacy, development, policy and standards, fiduciary accountability, program oversight and analysis, and provides financial administrative services regarding facilities issues.

The **OFEO Real Estate Group** provides consulting services for the oversight of leases, acquisition and disposition of Institution assets, property valuation, and financial analysis.

**Procedures for
Obtaining Services**

Whenever a modification to the physical plant or an exhibition is anticipated, a unit must immediately contact and notify the appropriate project manager and/or zone manager serving as the primary liaison between OFEO and the unit. No project shall proceed without this notification. The project manager and the zone manager, in concert with the appropriate reviewing units, will provide assistance to define the nature and magnitude of the project and will assist the unit in selecting the appropriate method(s) for requesting services and for implementing the project. Available options are as follows:

- Form SI-3506, Request for Protection Services Special Event Support; and
- Form SI-2773, Office of Facilities Engineering and Operations Project Submittal Request.

**Additional
Information**

More information on procedures for obtaining planning, design, and construction services is found in the OFEO *Facilities Project Management Handbook* located on the OFEO website.

**CANCELLATION:
INQUIRIES:
RETENTION:**

SD 410, March 4, 1994
Office of Facilities Engineering and Operations
Indefinite. Subject to review for currency 24 months from date of issue



SMITHSONIAN DIRECTIVE 411,

January 24, 2005,
Date Last Declared Current: September 24, 2010

SMITHSONIAN INSTITUTION PARKING PROGRAM

Purpose	1
Policy	1
Coverage	2
Administration of the Parking Program	2
Parking Committee	3
Eligibility	4
Parking Assignments	4
Applications for Parking Assignments	5
Day-at-a-Time Parking	7
Reserved Spaces	7
Director's Discretionary Spaces	8
Access to Parking Facilities	8
Parking Responsibilities	9
Compliance	11
Appendix A: Parking Assignments	
Appendix B: Parking Fees	
Appendix C: Daily Parking Procedures	

Purpose

This directive revises the policies and standards governing the assignment, use, and management of parking spaces controlled by the Smithsonian Institution.

Policy

The Smithsonian grants to employees and other approved individuals the privilege of parking privately owned vehicles in its lots and garages.

Government policy and initiatives discourage the use of privately-owned vehicles for commuting. Carpooling and public transportation have a positive effect on the environment, and Smithsonian policy reflects the Institution's concern with this issue.

Policy
(Continued)

Within this framework, the Smithsonian parking policy ensures that

- employees carpool and use public transportation
- eligible individuals can compete for spaces on a regular basis
- parking at the Smithsonian does not compromise the security of museums and other facilities
- reasonable parking fees are charged to staff members who use Smithsonian parking facilities during regular business hours, 6:00 a.m. to 3:00 p.m.

Coverage

The provisions of this directive apply to the following facilities:

- Smithsonian parking facilities on the Mall
- American Art/Portrait Gallery Building
- SI Service Center

This list may include additional facilities in the future.

The Cooper-Hewitt Museum in New York City and the Smithsonian Astrophysical Observatory in Cambridge, Massachusetts follow different parking policies and procedures.

**Administration of the
Parking Program**

The Parking Office, Office of Protection Services (OPS), is responsible for the administration of the parking program. Major duties include

- staffing parking lots during normal hours of operation
- determining and publicizing the normal hours of operation of parking facilities
- determining the number of parking spaces available for assignment through this parking policy
- assigning available parking spaces in accordance with the procedures outlined elsewhere in this directive

**Administration of the
Parking Program**
(Continued)

- setting aside reserved parking spaces at each parking location as appropriate in accordance with this directive
 - taking appropriate action to eliminate parking privilege abuse
 - recertifying assigned parking permits annually
 - rendering decisions on forfeited parking assignments
 - establishing controls on the entry/exit into parking facilities as determined by the Director, OPS
 - conducting periodic reviews of the parking program
 - implementing the decisions of the Parking Committee
-

Parking Committee

The Parking Committee reviews and acts upon requests for administrative exception to the point system (See Appendix A).

The Parking Committee comprises the following people:

- Two members appointed by the Deputy Secretary and Under Secretaries: one represents NMNH, and NASM, and the other represents NMAH and the remaining facilities
- The third member represents Local 2463, the American Federation of Government Employees (AFGE).

Parking Committee membership rotates on a staggered basis, with each individual serving for three years or less.

Individuals granted parking permits by the Parking Committee during the regular recertification period based on administrative exception receive their permits at the same time as other approved parking candidates. After the Parking Committee completes the parking recertification process, the remaining applicants are placed on a waiting list for the next available space.

The Parking Committee decides hardship issues.

Parking Committee decisions are final.

Eligibility

The following are categories of persons eligible for parking privileges at Smithsonian facilities. Certain restrictions may apply, as explained later in this directive.

- Smithsonian employees
- Employees of tenant organizations
- Docents and other volunteers (Please see the volunteer and/or docent coordinator for procedures for applying for parking privileges)
- Former staff with active emeritus status
- Official visitors and/or guests
- Contractors

Parking Assignments

OPS assigns parking spaces according to a point system outlined in Appendix A.

Parking permits are not transferable. To ensure equal opportunity parking for all qualified parking candidates, only permit holders and registered car-pool members may use an assigned space. Permit holders may not give, loan, sell or transfer their parking permits to other individuals. Individuals must apply in writing to the Parking Office to reassign parking permits. The Parking Office grants temporary permits to those who receive approval.

Termination of parking permits. Parking permits become void upon termination of Smithsonian employment or, in the case of assignment based upon a car pool, the dissolution of the car pool.

Except as noted in the following, parking permits are made to parking lots or garages, but not to specific spaces within lots or garages.

Parking Assignments
(Continued)

Regular parking permits are assigned via four methods:

- Individual (point system applies)
- Car pool (point system applies)
- Disability (point system does not apply)
- Administrative (point system does not apply)

In the event of identical point totals, the Parking Office assigns available spaces to those employees with the earliest date of continuous Smithsonian service. Individuals may combine unbroken trust and federal employment when determining the duration of their Smithsonian employment. Military service and sabbatical leave are not considered breaks in service.

Applications for Parking Assignments

Individual and car-pool application. All applicants must submit SI-3539, *Application for Individual or Car/Van-Pool Parking Permit*. Applicants who qualify in accordance with Appendix A are offered parking privileges first at the facility at which they work, and then in the lot at the National Air and Space Museum (NASM). The Parking Office maintains a waiting list.

Employees who relinquish permanent parking assignments must reapply. The Parking Office places their names on the waiting list for assignments as spaces become available.

Employees who relinquish a parking assignment because of temporary duty relocation to a facility at which parking is not available automatically qualify for parking upon relocation to a facility where parking is available.

Employees who relinquish a parking assignment because of interruptions due to military service or sabbatical leave as approved by the Smithsonian automatically qualify for parking upon their return to regular active duty.

**Applications for Parking
Assignments**
(Continued)

Administrative Application — Principal Deputy. In addition to form SI-3539, applicants must submit SI-3802 A, *Application for Administrative Parking — Principal Deputy*. The Director's signature on SI-3802 A certifies to the Parking Office that the applicant is the director's principal deputy.

Disability Application. Those individuals filing for parking based on a disability must submit SI-3539, SI-3800 *Application for Parking for Medical Reasons* and SI-3802 C *Application for Administrative Parking Exceptions Due to Disability* indicating the reason for the application.

To ensure confidentiality of medical information, applicants should submit forms SI-3802 C and SI-3800 in a sealed envelope to Occupational Health Services. Only Smithsonian medical officers have access to these documents, from which they make final decisions.

Administrative Exception Application. Individuals applying for parking based on work-related or personal hardship reasons such as those described in Appendix A must submit forms SI-3539 and SI-3802 B *Application for Administrative Exception*. The number of spaces allocated for administrative exceptions is 10 percent of the available spaces in each lot.

In either case, the Parking Office forwards applications to the Parking Committee for review and approval.

- **Work-related exceptions.** When an applicant applies for parking for work-related reasons, the applicant's unit director must sign the application and assign a priority number as listed in Appendix A.

Applications for Parking Assignments
(Continued)

- **Personal hardship exceptions.** Applicants applying for parking based on personal hardship do not require their unit director's signature.
- **Temporary Assignment for Medical Reasons.** The Parking Office allots temporary parking permits to employees with temporary medical conditions, such as a broken leg, that significantly interfere with their ability to travel on public transportation.

Temporary assignment applicants submit SI-3800 to Occupational Health Services with administratively acceptable documentation that includes an estimate of the duration of the temporary medical condition.

Parking assigned for temporary medical conditions is subject to medical recertification at the discretion of Occupational Health Services.

Day-at-a-time Parking

The Parking Office allots a limited number of spaces for those who park a day at a time. Most of these spaces are available in the NASM Garage. Appendix C provides instructions on how to request day-at-a-time parking.

Daily parkers are responsible for abiding by all requirements appropriate to their parking status. Daily parkers must park in spaces reserved for day-at-a-time parking.

Former employees with emeritus status, official visitors, guests, and contractors are accommodated on a space-available basis by contacting the Parking Office.

Reserved Spaces

The Parking Office designates reserved parking spaces for members of the Secretary's senior staff, unit directors, and heads of major offices, according to the approved Smithsonian organization chart.

Reserved Spaces
(Continued)

The Parking Office may reserve spaces in each lot or garage for parking by official visitors, vehicle loading and/or unloading, or other appropriate purposes.

Director's Discretionary Spaces

Five spaces are reserved for the use of the directors of the National Air and Space Museum, the National Museum of American History, and the National Museum of Natural History. Up to three spaces are reserved for the directors of the Hirshhorn Museum and Sculpture Garden, Arthur M. Sackler Gallery/Freer Gallery of Art, Smithsonian American Art Museum, National Portrait Gallery, and National Museum of African Art.

Spaces reserved for the use of directors may be assigned on a daily basis to official visitors, guests and, when necessary to support the conduct of official business or to support mission-related functions, employees. These spaces may not be assigned to employees to circumvent parking qualification and payment. They should not be assigned to employees for personal reasons or on a regular basis.

When assigning a discretionary space, directors must notify the Parking Office ahead of time to ensure that entry to the parking lot can be authorized.

Access to Parking Facilities

Payment of monthly parking fees entitles the permit holder to use a parking space in a designated lot or garage. The parking fee is not refundable and it is not prorated for days on which the permit holder does not park. The availability of parking spaces is not guaranteed after 9:30 a.m. After that time, the permit holder parks on a space-available basis only.

**Access to Parking
Facilities**
(Continued)

Payment of the day-at-a-time fee entitles the day-at-a-time permit holder to park in the designated lot only on that designated day. The fee is non-refundable.

Docents and volunteers may park at an assigned lot on a space-available basis after 9:30 a.m. OPS develops procedures to determine docent and volunteer parking eligibility in conjunction with the Visitor Information and Associates' Reception Center and the appropriate unit volunteer/docent offices.

Admission to parking facilities is conditional upon display of appropriate identification. Drivers must display a valid parking permit, showing payment of the required fee, at the parking lot entrance, and prominently display the permit on the dashboard of the vehicle at all times while it is parked in a Smithsonian facility.

Security officers at the parking lot entrance may require intermittent users, including official visitors, guests, and board members, to show a form of photographic identification.

OPS may establish additional or alternate requirements based upon its assessment of changing security needs.

Parking Responsibilities

All regular and temporary permit holders must

- ensure that all application information is accurate, including information provided by/for car-pool members
- display their parking permit on the dashboard or rear view mirror when inside the facility
- have their official Smithsonian identification ready for display upon entering the parking facility

Parking Responsibilities
(Continued)

- ensure that they allow only qualified, registered riders to accompany them to underground SI parking facilities
- drive in a careful and safe manner at all times
- comply with the signals and directions of the attendants and security officers
- comply with all posted traffic signs and signals
- report all accidents immediately to the appropriate security office
- lock their vehicles (drivers/passengers leave items in their vehicles at their own risk)
- ensure their vehicles do not block entrances, driveways, walks, loading platforms, or fire hydrants
- refrain from parking in reserved spaces without permission or in *No Parking* or *Handicapped* areas
- report lost card keys (if issued for entry into certain parking facilities) to OPS immediately
- refrain from performing any type of maintenance, such as oil changes, on privately owned vehicles while parked in a Smithsonian facility. Security officers may deny entrance to vehicles that breach Smithsonian security and/or safety codes, such as cars with gas or oil leaks
- inform the Parking Office of planned absences in order to accommodate short-term parking needs
- refrain from overnight or all-weekend parking without notifying the Parking Office in advance
- ensure that only authorized car-pool members use their parking permit

Compliance

Failure to comply with the provisions of this directive and/or fraudulent or improper use of a parking assignment may lead to forfeiture of the parking assignment and/or to disciplinary action. Falsifying information will result in revocation of parking privileges and/or disciplinary action, and/or may constitute criminal fraud.

CANCELLATION:

SD 411, May 27, 1999

INQUIRIES:

Office of Protection Services (OPS)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issuance

PARKING ASSIGNMENTS

Administrative Assignment. The Smithsonian Institution provides parking for senior staff, unit directors, and heads of major offices, along with their principal deputies, as designated in the approved Smithsonian organization chart.

Individual Assignment. The Parking Office issues parking permits to individuals who qualify under the point system for 12-month periods. Each applicant receives two points for each year of continuous Smithsonian (federal and trust combined) or tenant organization service.

Car-pool Assignment. Individuals granted car-pool parking assignments receive 12-month permits. The Parking Office gives preferential treatment to car-pool applications by adding points to those earned for years of service.

To qualify, the proposed car pool must consist of two or more Smithsonian or tenant employees. For example:

The driver receives two points for each year of continuous Smithsonian or tenant organization service. Each Smithsonian or tenant employee (excluding the driver/permit holder) generates 10 points. Additional non-SI employees in the car pool generate two points.

7 years Smithsonian service (driver)	14 points
3 Smithsonian and/or tenant riders (excluding driver)	30 points
1 non-Smithsonian rider	<u>2 points</u>
Total	46 points

The permit holder must notify the Parking Office immediately of additions or deletions to the car pool as they occur during the year. Loss or change of membership may invalidate a car pool's permit.

If the permit holder of a car pool terminates his or her Smithsonian employment, the parking permit is revoked.

All non-Smithsonian car-pool members must submit a verification of employment with the car-pool parking application. The individual requesting the permit must ensure that all non-Smithsonian car-pool members supply the necessary documents with the completed application. Failure to supply them may cause the application process to be delayed and/or the application to be rejected.

PARKING ASSIGNMENTS (Continued)

Disability Assignment. Employees with disabilities qualify for parking permits outside the point system. Individuals applying for disability assignment must qualify under the *Uniform System for Parking for Persons with Disabilities* as set forth by the United States Department of Transportation, which means that the applicant must meet at least one of the following conditions:

- cannot walk two hundred feet without stopping to rest
- cannot walk without the use or assistance of a brace, cane, crutch, another person, prosthetic device, wheelchair, or other assistance device
- is restricted by lung disease to such an extent that the person's forced (respiratory) expiratory volume for one second, when measured by spirometry, is less than one liter, or the arterial oxygen tension is less than 60 mm/hg on room air at rest
- must use portable oxygen
- has a cardiac condition classified as severe according to the American Heart Association standards (Class III or Class IV)
- is severely limited in the ability to walk due to an arthritic, neurological, or orthopedic condition

Administrative Exceptions. Applicants who do not qualify for parking assignment via the point system or administrative assignment may apply for parking based on work-related reasons or personal hardship. The number of spaces allocated for administrative exception is limited to 10 percent of the available spaces in each lot.

If the request is based on work-related reasons, the applicant's unit director must sign the SI-3802 B. If more than one employee is requesting an administrative exception, the unit director must assign a priority number to each request.

If the request is based on personal hardship, the SI-3802 B need not be approved by the unit director.

The Parking Committee has a review process that ranks administrative exception applications in order from least priority to most urgent on a scale from 1 to 5, respectively.

PARKING ASSIGNMENTS (Continued)

- ***Work-related reasons***
 - frequent off-site travel to areas inaccessible by public transportation 5
 - unpredictable schedule demands flexibility (must provide sample schedule) 3
 - frequently scheduled overtime 1
- ***Personal hardship***
 - catastrophic family illness; permit holder is primary caregiver 5
 - daycare/childcare needs 2
 - lack of access to public transportation 1

PARKING FEES

Monthly Fee. Regular and temporary permit holders must pay the monthly parking fee as follows.

Payments must be made by the 25th of the month preceding the month covered by the payment. Individuals who mail their payments or pay by credit card may pay in advance for all months through September each year.

- For permit holders covered by the collective bargaining agreement between the Smithsonian Institution and Local 2463, AFGE, the monthly fee is \$85.00.
- All other permit holders pay \$120.00 per month.
- Permit holders who do not intend to park for the entire month because of official travel, military service, or other work-related reasons outlined in SD 411 are exempt from the parking fee, but they must notify the Parking Office in advance. Permit holders who do not intend to park for the entire month because of personal leave or vacation must either pay the parking fee or relinquish their parking assignment.

Day-at-a-Time Fee. The day-at-a-time fee is \$8.00 per day, and must be submitted before 9:30 p.m. the day it is used. Please refer to Appendix C for further instructions on payment of the day-at-a-time fee.

Rate Changes. Parking fees are subject to change once annually. Instructions for payment, however, may be changed at any time.

Exemptions from Payment of Parking Fees. Parking fees are waived for those individuals within the following categories:

- Staff who park only during non-standard hours (generally between 3:00 p.m. and 6:00 a.m.). Daily parking weekends and holidays also is free.
- Volunteers and docents
- Staff required by Smithsonian to drive their privately owned vehicles to work for a short duration when approved by a museum director, an Under Secretary, the Deputy Secretary, or the Secretary
- Official visitors
- Construction contractors

DAILY PARKING PROCEDURES

The Smithsonian Parking Office allots a specific, limited number of parking spaces for \$8.00 per day, Monday through Friday, at the National Air and Space Museum. Employees who failed to qualify during recertification and/or drive to work infrequently generally use these spaces. Employees may reserve these spaces on a first-come-first-served basis.

To reserve a space, an employee must telephone the Parking Office between 8:30 a.m. and 12:00 p.m. on the workday preceding the day on which the space is needed. The Parking Office records the employee's name and work telephone number, and, if a space is available, gives the employee the space number.

The Parking Office does not honor requests sent via facsimile, on other phone lines, or telephoned earlier than one day prior to the day needed.

Individuals must show a valid Smithsonian ID badge when entering the parking facility. They receive a two-part form that defines the parking assignment and provides instructions for payment.

Individuals using the daily parking must remit the \$8.00 fee in CASH ONLY by 9:30 p.m. They may pay in the Parking Office, located in the National Air and Space Museum garage, Room P-706A. They also may deposit the money in the lock box located directly outside the Parking Office.

Payment is due for every reservation that is not cancelled before 8:00 a.m. Individuals who fail to pay for a reserved daily space, whether used or not, may receive a bill from the Office of the Comptroller and/or face exclusion from future daily parking privileges.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 414,

July 14, 2004,
Date Last Declared Current: July 27, 2005

SI ENERGY MANAGEMENT PROGRAM & WATER SUPPLY EMERGENCY PLAN

SI Energy Management Program	
Background	1
Purpose	2
Scope	2
SI Energy Management Policy	2
Responsibilities	4
Water Supply Emergency Plan	
Background	8
Purpose	8
Water Supply Emergency Plan	8
Stages of Water Use	9
Responsibilities	10

Part I, SI Energy Management Program

Background

The Office of Facilities Engineering & Operations (OFEO) plans, designs, constructs, operates, maintains, preserves, repairs, renovates and manages most SI owned facilities. These facilities range in age from new to nearly 150 years, of which several have been designated national historic landmarks.

The acquisition and management of energy is fundamental to the mission of the Institution and to providing a constant archival climate for Smithsonian programs and activities. This requires a program that ensures SI facilities are operating, maintaining and repairing components of the utility systems to attain optimum efficiency in energy use.

Purpose	<p>This directive establishes basic Smithsonian energy management policy and assigns responsibility for administering a comprehensive energy management program. This directive combines into one document what was formally SD 414 and SD 415. The program includes all energy use and conservation techniques designed to meet the current and future energy needs of the Smithsonian Institution.</p>
Scope	<p>This directive applies to all Smithsonian units and to all facilities under the control of the Smithsonian Institution in the United States and international locations. There are no exceptions to the provisions of this directive, unless program requirements for disregarding this policy are validated through the review process provided in SD 410, Physical Plant Construction and Improvement Projects.</p>
Definitions	<p>Permanent Buildings are administered on a permanent basis and consist of museums, research facilities, storage and administrative buildings.</p> <p>Temporary Buildings are non-permanent structures designed for easy erection, dismantling, moving and reuse.</p> <p>Seasonal use buildings provide temporary needs on an intermittent seasonal basis.</p> <p>Auxiliary Activities are museum shops, theaters, cafeterias, restaurants, etc. that incur energy costs on Smithsonian property.</p>
SI Energy Management Policy	<p>The purpose of the Energy Management Program is to ensure that appropriate and adequate energy is available to all facilities, and ensure that the facilities are operated in the most efficient and cost-effective manner possible. Facilities included in this responsibility include permanent, temporary and seasonal buildings.</p>

**SI Energy
Management Policy**
(continued)

Objectives of the Energy Management Program are:

- to promote the judicious and pragmatic use of energy procurement, utility management and the efficient use of energy transfer technology while minimizing expenditures
- to provide a secure, reliable, and affordable supply of energy while maintaining the objectives of a controlled, environment for research, museum collections and archival preservation

The Energy Management Program provides:

- structured and accountable energy management practices
- fiscal accountability for energy use and conservation projects
- efficient, collaborative mechanisms for purchasing and delivering energy
- a review of the impact on future utility budgets of planned design, engineering, and construction projects
- collaboration with OFEO engineers, when appropriate, to assist in providing alternative provisions to finance capital improvements, renovations and maintenance of mechanical equipment that demonstrate a positive cash flow on current and future Smithsonian energy costs

Responsibilities

The Director, Office of Facilities Engineering and Operations, is responsible for:

- developing long and short term programs to control energy use in the Smithsonian Institution
- establishing reporting procedures for all energy conservation projects
- developing an annual and long term budget planning effort to support efficient energy use and goals in conjunction with the Office of Planning, Management and Budget
- promoting research for the development of efficient energy strategies
- reporting periodically to the Secretary and Deputy Secretary on energy conservation goals, objectives, and accomplishments
- collecting reimbursement funds from auxiliary activities through the Resource Management Branch, OFEO

The Director, Office of Facilities Engineering and Operations and the Director, Office of Project Management are responsible for:

- keeping current on the development of energy-saving equipment, devices, and systems applicable to the Smithsonian's needs
- establishing long-range plans for conversion of inefficient and outmoded systems in Smithsonian-owned buildings and equipment
- developing designs that incorporate contingency planning to ease the impact of a sudden disruption in supplies of oil-based fuels, natural gas, or electricity

Responsibilities
(continued)

- establishing specific energy standards that will serve as guidelines for architects, engineers, curators, exhibit designers, and others who have a reason to alter lighting, temperature, or humidity levels in Smithsonian facilities
- incorporating energy conservation in all plans and projects subject to the review process in SD 410
- requiring that architectural/engineering firms conducting studies or developing plans for construction or alteration of facilities and utilities systems produce designs or recommendations that are the most energy efficient in HVAC, lighting, building envelope, and incorporate the use of renewable energy where possible

**The Director, Office of Facilities Reliability (OFR),
Energy Management Branch, is responsible for:**

- administering an SI-wide energy management program and water supply emergency program
- collecting and analyzing existing historical energy consumption use in a database
- anticipating changes in the availability and cost of energy sources
- developing contingency planning to ease the impact of a sudden disruption in supplies of fossil fuels, natural gas, or electricity
- tracking energy consumption using an electronic database
- revising and updating the policies of the SI Energy Management Program

Responsibilities
(Continued)

- purchasing energy in a deregulated market through GSA contracts or Defense fuel suppliers
- performing energy audits of all SI facilities every three years
- performing reviews of all SI construction and renovation projects in conjunction with the SD 410 process
- serving as the liaison with utility companies and federal agencies such as the Department of Energy
- determining that HVAC and lighting systems at SI facilities operate at optimum levels
- reviewing and implementing curtailment strategies for limiting energy use in summer and winter to reduce consumption and cost
- forecasting and projecting the utility budget on an annual basis

The Chief Executive Officer, Smithsonian Business Ventures (SBV) is responsible for:

- ensuring that business activities occupying Smithsonian space will cover all heating and cooling costs of their operations
- paying utility costs for SBV-operated concessions, museum shops, theaters and other Smithsonian activities that have utility cost and consumption on or within Smithsonian facilities
- recovering utility costs by real time metering or energy consumption calculations mutually agreed upon by the parties involved

Responsibilities
(continued)

- reviewing, in conjunction with the Deputy Secretary, failure by any SBV-operated activity to pay for its utility usage

Zone Managers are responsible for:

- establishing and conducting an energy conservation plan of action within their areas of jurisdiction, in conjunction with the OFR, Energy Management Branch
- acting as the lead energy conservers for their zones
- recognizing and rewarding energy conservation efforts in specific facilities under their authority that reduce energy costs due to energy-conscious decisions
- coordinating and monitoring the assigned areas for compliance with energy conservation practices

Part II, Water Supply Emergency Plan

Background

The Smithsonian Institution's largest concentration of facilities, including those located in the District of Columbia, Maryland, and Northern Virginia, are supplied water from the Potomac River Basin.

The Smithsonian Institution is a retail customer of the DC Water and Sewer Authority (WASA), Washington Suburban Sanitary Commission (WSSC), Fairfax County Water Authority, New York City Department of Environmental Protection, and the City of Front Royal, Virginia, and is dependent on regional water supplies.

The availability of water for the metropolitan Washington, DC area is determined by a combination of factors, including the amount of regional water reserves, as well as intergovernmental actions of the U.S. Army Corps of Engineers and the states of Maryland and Virginia.

Purpose

This directive establishes a SI Water Supply Emergency Plan designed to address the supply of water for Smithsonian facilities under emergency situations. This plan is consistent with the “draft” Water Supply Emergency Plan for the Washington metropolitan area.

Water Supply Emergency Plan

The purpose of the Water Supply Emergency Plan is to:

- provide a response to conditions announced by the Interstate Committee on the Potomac River Basin Cooperative and other advisory groups that regulate DC WASA, WSSC, Fairfax County Water Authority, or other retail suppliers of water to Smithsonian facilities.

**Water Supply
Emergency Plan**
(continued)

- outline reasonable and prudent procedures in the event of an interdiction or contamination of water supplies and advise responders on the chain of information available to the Institution and possible water resources available in the affected region.
 - coordinate appropriate responses with the Office of Safety and Environmental Management, Office of Protective Services, building managers, and zone liaisons when supplies of drinking water are threatened by internal or external contamination.
 - initiate wise water use policies and execute measures that reduce costs associated with water in Smithsonian facilities.
-

Stages of Water Use

For purposes of water supply operations that respond to conditions announced by the Interstate Committee on the Potomac River Basin Cooperative, the following applies:

Normal Condition Status: Wise water use, general information, no alerts and routine reporting. SI will maintain normal water conservation techniques.

Voluntary Water Conservation Status:
Announcement of voluntary water conservation recommendations. SI will request staff to voluntarily conserve water resources.

Voluntary Water Restrictions Status: Announcement of voluntary water restrictions. SI will limit watering for vegetation and irrigation.

Mandatory Water Restrictions Status:
Announcements of mandatory water restrictions. SI will issue instructions to staff outlining areas to be addressed. OFR will be responsible for disseminating such instructions.

Responsibilities

As the office with primary knowledge of the water supply system, the Energy Management Branch, OFR, is the lead office in implementing the Institution's water supply emergency plan.

OFR, through zone managers and building managers, directs and manages the Smithsonian Water Supply Emergency Plan as follows:

- coordinates with the Metropolitan Washington Council of Governments, US Army Corps of Engineers, DC WASA, WSSC, Fairfax Water County Authority, Town of Front Royal Virginia and New York City Department of Environmental Protection on emergency procedures, metering, flow and feed capacity, and water quality for Smithsonian facilities
- maintains and updates contacts with water suppliers, determining resources and obtaining emergency plans as available
- informs building managers, zone managers, the Office of Protective Services, and the Office of Safety and Environmental Management of actions to be implemented in the event of an interdiction or contamination of water supplies and in accordance with conditions announced by the Interstate Committee on the Potomac River Basin Cooperative

CANCELLATION:
INQUIRIES:
RETENTION:

SD 414, May 21, 1992 and SD 415, October 9, 1980
Office of Facilities Engineering and Operations
Indefinite. Subject to review for currency 24 months from date of issue

REAL ESTATE ASSET MANAGEMENT

Purpose	1
Definitions	1
General Policy	2
Mission	3
Roles and Responsibilities	4
Record Keeping	5
Authorities	5
Applicability	8

Purpose

This directive provides policy guidance for all Smithsonian Institution (SI) units with respect to real property transactions of all types, as well as direction related to the efficient use of space for SI assets. The directive is intended to improve space allocation, anticipate and address future space requirements, identify and track all SI real property interests, and maximize fiscal accountability and responsibility.

Definitions

Asset Management (AM) is the process whereby SI real property is accounted for, periodically reviewed, efficiently acquired, and appropriately disposed of in a manner that ensures excellent facilities at a cost-effective price, and which enhances the Institution's financial strength. AM considers the financial, maintenance, and suitability implications of real property actions but does not generally oversee day-to-day, individual facility management. AM includes, but is not limited to, lease management, acquisition and disposition of real property, real property inventory, space allocation and management, and life-cycle analysis.

Facilities Inventory is a listing of real estate that identifies current space characteristics by physical location, area, quality, occupancy, ownership, and suitability, and is a critical component of ongoing real estate documentation, management, and recording.

Definitions
(continued)

Lease Management is the process of managing the financial and legal obligations of a real property lease.

Real Estate includes interests in real property that are referred to as rights or estates; hence, real estate is somewhat similar to real property but more limited in scope. See definition for “Real Property” below.

Real Property is any interest in land, together with the improvements, structures and fixtures (for example, installed equipment) located thereon and appurtenances¹ thereto. The interest includes leaseholds, easements, rights-of-way, water rights, air rights, and rights of lateral and subjacent² support. It does not include moveable equipment or trade fixtures.

Real Estate Asset Records are data kept on property information that includes physical and financial details, asset and service performance indicators, history, transactions, and legal documents.

Real Property Officer is a person who is responsible to the organization/entity for the inventory management, assets accounting, assignment of space, space utilization, and real estate.

Utilization Planning is the process of developing management strategies that ensure the best use of assets consistent with the Smithsonian Institution’s plans and strategies. Moreover, the plan ensures compatibility between the composition of the asset portfolio and the requirements of the Institution.

General Policy

The Smithsonian Institution is committed to a real property program which will ensure quality facilities for the museums, research centers, and offices, and their administrative support staff. A systematic and verifiable

¹ Appurtenances are a right or property attached to or an accessory to the property.

² Subjacent refers to rights or obligations related to that which is underlying the subject property or adjacent property.

General Policy
(continued)

approach to AM requires focused coordination, diligence, and oversight of all SI real property assets.

The Smithsonian is committed to following federal real property guidelines to the extent practicable and consistent with the SI mission.

The asset portfolio is actively managed (i.e., regularly analyzed) for opportunities to improve efficiency, reduce costs (such as lease payments), provide additional services or space at reduced costs, or to free up capital.

Facility investments are made based upon objective performance criteria, fulfillment of the intended mission, and life-cycle cost/benefits analysis.

AM decisions integrate with the Smithsonian Institution's strategic planning process.

Lease vs. ownership decisions are based upon the mission-critical need for the requirement, financial cost to the Institution in both the short and long terms, maintenance costs, and the degree of control of the physical plant desired by the Smithsonian Institution.

The Smithsonian Institution endeavors to maximize the asset value of owned property so that the cash value may be used to effectively benefit the financial and operational goals of the Institution.

Mission

The Smithsonian implements its real estate asset management policy by accomplishing its mission to provide real property resources sufficient for research, analysis, and display and housing of artifacts in an attractive, safe, and secure environment. The Smithsonian must also anticipate new investigations and research, including cultural outreach in furtherance of its mission. Finally, the Institution must be sensitive to the needs of historically significant structures which require special treatment to be saved for posterity.

Mission (continued)	The structured management of SI real property assets is essential to effectively monitor the inventory and related costs, and to plan for future needs.
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Roles and Responsibilities	The Office of Facilities Engineering and Operations (OFEO) is responsible for ensuring that:
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- a. contractual obligations are executed by the Office of Contracting and Personal Property Management (OCon&PPM) after OFEO concurs; and real property actions are reviewed and approved for legal compliance and prudence by the Office of General Counsel (OGC);
- b. all actions are consistent with the AM plan and financial integrity and funding limitations as set by the Chief Financial Officer (CFO) and its related offices (i.e., the Office of Planning, Management, and Budget [OPMB], OCon&PPM, the Office of the Treasurer [OT], and the Office of the Comptroller [OC])³;
- c. real estate processes are appropriately described in a *Real Property Asset Manual*, which OFEO updates regularly
- d. all leased assets are centrally monitored, including financial oversight through federal and/or trust funding and/or transfers from individual units that benefit from such space; and
- e. a framework of procedures and criteria is developed to align SI goals and objectives with those of individual units, so that the Smithsonian's overall mission can be accomplished

All SI units must:

- a. be financially responsible, to the extent practicable, for the cost of real property interests for space (such as lease payments) from which they receive a benefit; and

³ Employees at certain units may be delegated contracting authority for some real property activities. Delegatees are responsible for complying with the requirements of this directive.

**Roles and
Responsibilities**
(continued)

- b. develop a five-year Real Property Plan that identifies current and upcoming requirements as well as funding sources. The plan should be updated on an annual cycle.

The **Capital Planning Board** is responsible for (a) providing advice, counsel, and recommendations for consideration by the Secretary related to planning and implementation of the Institution's capital program, some of which may involve real property transactions; and (b) evaluating the capital program and major capital projects (more than \$5 million in total cost), some of which may involve real property transactions, to ensure that they are consistent with strategic plans, priorities, and available resources.

Record Keeping

The official repositories for real property-related documents can be found at the following locations:

- a. OCon&PPM — for originals of all contract documents and copies of legal documents
- b. OGC — for originals of key legal documents
- c. OFEO-Real Estate (RE) Division — for copies of all contract documents; legal instruments; and originals of valuation, market studies, and space analysis studies
- d. OC — for copies of the lease agreements that meet **any** of the criteria listed in the —Accounting and Financial Review” subsection of the —Authorities” section on pages 7 and 8.

Authorities

Enabling

The SI **Board of Regents** has sole authority for the real property of the Smithsonian Institution, a trust instrumentality of the United States, and for the legal and fiduciary obligations associated with its possession, use, and management. (See *The Act of August 10, 1846*, 9 Stat. 102–106, 20 *United States Code* [U.S.C.] §§ 41–70; 76aa–80d; and 80k–85.)

Authorities
(continued)

The Board of Regents retains ultimate oversight, authority, and fiduciary responsibility for Smithsonian real property, delegating to the Secretary of the Smithsonian operational oversight according to the policies and bylaws of the Board of Regents.

The Secretary, on behalf of the Board of Regents, ensures that:

- a. Smithsonian real estate supports the mission of the Institution;
- b. Real estate growth is balanced with needs and resources; and
- c. Real estate management policies are established, implemented, and monitored

Operational

The Secretary receives approval by the Executive Committee of the Board of Regents prior to real estate actions with a net present value of \$5,000,000 or more. For projects with a net present value of \$10,000,000 or more, the full Board of Regents approves the action. All transactions likely to create public debate and/or having broad policy implications should be brought to and approved by the Board of Regents.

OFEO has been designated as the principal unit for oversight of all SI real property-related matters, which include but are not limited to transactional matters, space allocation, future property requirements, and financial oversight and tracking of real property. The Director, OFEO, has responsibility for real property actions, subject to review and approval by the Under Secretary for Finance and Administration, Secretary, and the Board of Regents, as required. The Director, OFEO, or designee, is responsible for all business terms for all real property actions.

The Director, OCon&PPM, or designee, is responsible for the execution of all real property contracts.

The Director, OFEO, or designee, ensures that all actions have the concurrence of the Treasurer,

Authorities
(continued)

Director, OCon&PPM, CFO, and the General Counsel, with regard to their respective specialties.

The OFEO-RE Division provides its expertise, oversight, technical consultation, counsel, and coordination with all units regarding implementation of this directive. The RE Division is also responsible for reporting on space utilization and assignments, as well as for maintenance of real property records, which are periodically updated with the support of individual units.

OFEQ-RE is the acquisition and disposition agent for the Smithsonian Institution and its units, and has oversight responsibility for leased properties (including the —central rent account”).

Each SI unit designates a qualified real property coordinator who is the liaison person with OFEO and its RE Division regarding any proposed real property actions.

Real property transactions by Smithsonian Enterprises (SE), the Smithsonian Astrophysical Observatory (SAO), the Smithsonian Environmental Research Center (SERC), and the Smithsonian Tropical Research Institute (STRI) are forwarded to OFEO-RE and the OGC for review and documentation prior to execution.

Accounting and Financial Review

For all leasing agreements entered into by the Institution that meet **any** of the following criteria, the Comptroller of the Institution, or his/her designee, will receive for review a complete copy of said leasing agreement to determine the proper accounting and/or financial implications to the Institution of this agreement before the lease is executed. Leasing transactions that meet the following criteria will be included in this review process:

- a. Lease term, including all possible lease renewal periods of at least five years or greater in length

Authorities
(continued)

- b. Annual lease payments, including all costs, escalation amounts, taxes, and other operating costs paid as part of the leasing agreement that exceed \$500,000 per annum
- c. Terms of the leasing arrangement, including any clauses indicating landlord-funded tenant improvement allowances, rebates, build-out allowances, or any other payments to be made by the landlord on behalf of the Institution.

The Comptroller will inform OFEO of the results of the review and the proper accounting implications as a result of entering into this leasing agreement.

Upon execution of the leasing agreement and approval by the appropriate representative of the OCon&PPM, a complete copy of the fully executed leasing agreement will be forwarded to the Comptroller to support the underlying accounting for this transaction.

Applicability

This directive encompasses all real property owned, leased, or controlled by the Smithsonian Institution and its units. Similarly, all disposition or acquisition of real property interests by cash, gift, bequest, or otherwise are governed by this directive.

All support units, unit directors, and Under Secretaries are responsible for adhering to these policies and for ensuring that their individual units' operating guidelines conform to this directive.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 416, May 1, 2003
Office of Facilities Engineering and Operations
Indefinite. Subject to review for currency 24 months from date of issue

SECURITY OPERATIONS AND POLICIES

Purpose	1
Background	1
Policy	2
Authority	2
OPS Roles and Responsibilities	2
SI Staff Roles and Responsibilities	3

Purpose

This directive establishes policies, roles, and responsibilities to provide physical security and protection for the personnel, visitors, collections, facilities, and property of the Smithsonian Institution (SI) through the Office of Protection Services (OPS).

Background

The Smithsonian organized the OPS in 1973 to unify the administration of protection, security, safety, and health services for the Institution. Subsequent reorganizations in 1986 and 1995 moved some of these functions to the Office of Safety, Health and Environmental Management (OSHEM). OPS is organized under the Office of Facilities Engineering and Operations (OFEO), and currently consists of five major divisions or sections:

- Operations (including the disaster management program)
- Technical Security (including risk assessment and management)
- Administration (including personnel security and ID office)
- Internal OPS Safety
- SI Parking Office

Information on OPS functions, policies, and procedures is available on the OPS intranet website: <http://ops.si.edu>.

Policy

Through coordination with other Smithsonian offices and units, OPS executes security and disaster/emergency management programs, develops security management policy and standards, and provides security planning and protection for facilities and areas under their control. This generally includes SI-owned and leased facilities in the Washington metropolitan area, Virginia, Maryland, New York City metropolitan area, and Panama, and includes supervision and funding for contract guard services at select facilities. For all other SI-owned and leased facilities, OPS provides policy guidance, security assistance, risk assessment and mitigation recommendations, and other specially arranged consultation or protection services.

This directive establishes policies consistent with generally accepted security principles and requirements associated with cultural property protection and federal facilities.

The Institution's security policies are also further defined in other programs identified within:

- SD 109, *Disaster Management Program*
- SDs 212 and 213, *Federal and Trust Personnel Handbooks, Chapters 731, Personnel Security*
- SD 223, *Drug Testing for Designated Security Employees*
- SD 224, *Identity Management Program*
- SD 406, *Property Pass System*
- SD 411, *Smithsonian Institution Parking Program*

Authority

In carrying out its responsibilities, OPS is guided by the Smithsonian policing statute, 40 *United States Code* (U.S.C.) Sections 6301 *et seq.*, and its implementing regulations at 36 *Code of Federal Regulations* (CFR) Part 504.

OPS Roles and Responsibilities

Responsibility for defining and meeting protection goals lies with OPS based on risk assessments and consultations with heads of units and major offices, and the SI staff. OPS has administrative and operational control over the protection force, protection programs,

OPS Roles and Responsibilities
(continued)

and protection systems. OPS works with heads of units and major offices in the formulation of protection policy and protection goals.

SI Staff Roles and Responsibilities

Heads of units and major offices are expected to:

- cooperate with OPS in determining protection goals and developing protection policy.
- ensure that ample notice of construction, installation, change or removal of exhibits, special events, collection movement, and any other activity or event that would require protection or affect protection operations is given to OPS in a reasonable and timely manner.
- ensure that protection policies and procedures are observed throughout their areas of responsibility as appropriate and applicable.

Smithsonian staff are expected to cooperate with OPS by observing the requirements of protection policies and procedures, and by following the instructions of members of the protection force. Staff members are generally responsible for the security of their work areas and are responsible for securing those areas and the property they contain (including the National Collections) whenever they will be left unattended. Further information about staff responsibilities may be found at <http://www.ops.si.edu>.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 420, June 6, 2006
Office of Protection Services, Office of Facilities Engineering and Operations
Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 422,

November 13, 2006,

Date Last Declared Current: February 28, 2011

SUSTAINABLE DESIGN OF SMITHSONIAN FACILITIES

Introduction	1
Background	1
Policy	2
Principles	2
Goal	3
Objectives	3
Responsibilities	4
Additional Information	5

Introduction

This directive affirms the Smithsonian Institution's commitment to being a responsible environmental steward through the consideration of the environment in its facilities operations. This commitment is manifested by incorporating principles of sustainability and energy efficiency into all of its building projects through the practice of designing, constructing, procuring, operating, maintaining, and removing buildings in ways that conserve natural resources and reduce pollution.

Background

Sustainable design improves building performance and reduces negative impacts on the environment and on the health and comfort of building occupants. It is an integrated, synergistic approach, in which all phases of the facility's life cycle are considered. The result is an optimal balance of cost, environmental, societal, and human benefits, which also meet the mission and function of the intended facility or infrastructure.

Sustainability is the concept of incorporating appropriate sustainable principles to improve a project's contribution to natural, social, and economic prosperity throughout its life cycle. Key themes of

Background
(continued)

sustainability are interdependence, a broad area of concern, prosperity, and a timeline that includes current as well as future results.

Policy

To the maximum extent practicable, the Smithsonian Institution is committed to constructing and managing its buildings and facilities operations consistent with related federal environmental and energy management policies and legislative mandates.

The Smithsonian Institution uses the International Energy Conservation Code (IECC) as its standard for energy efficient design. The standard is incorporated by reference in the International Building Code (IBC) and International Existing Building Code (IEBC) for all levels of alterations, excluding repairs as defined.

In addition, the Smithsonian refers to the guidelines in Executive Order 13123, *Greening the Government through Efficient Energy Management*, which cites sustainable building design for the site selection, design, construction, and deconstruction of facilities as an energy management strategy to help attain the Institution's energy efficiency improvement and greenhouse gas emission reduction goals.

Other Smithsonian Institution energy program guidance is referenced in the current Smithsonian Directive 414, *SI Energy Management Program and Water Supply Emergency Plan*, which is available on PRISM.

Principles

The essential principles of sustainable design and development for the Smithsonian Institution address the following factors:

- **Site** — Optimize site potential and minimize adverse environmental and transportation impacts.
- **Energy** — Minimize the Institution's consumption of non-renewable sources of energy.
- **Materials** — Use environmentally preferable products, such as those that are reused, recycled,

- Principles** (continued)
- recyclable, non-toxic, of low-embodied energy content, and/or renewable.
- **Water** — Protect and conserve water supplies.
 - **Indoor Environmental Quality** — Enhance the indoor environmental quality of the Smithsonian's buildings to promote the health of employees and increase worker productivity.
 - **Operations and Maintenance** — Design facilities for operational and maintenance efficiency, using materials noted for their longevity, robustness, and low toxicity.
-

Goal

The Smithsonian's goal is to design, build, and maintain facilities that are eligible for, and that obtain, certification under the nationally recognized criteria for sustainability established by the U.S. Green Building Council's (USGBC) initiative for Leadership in Energy & Environmental Design (LEED). The intent of this goal is to ensure that sustainable design will be integrated as seamlessly as possible into the existing building and exhibit design, construction, and building operations and maintenance processes.

- Objectives**
- Recognizing that this goal will take years to achieve, the Institution will begin this practice by:
- aiming at LEED certification for all new facilities and existing buildings undergoing renovation work
 - incorporating the pre-requisites needed to obtain LEED certification into the day-to-day planning, engineering, design, construction, deconstruction, maintenance, and operations of Smithsonian facilities. The list of pre-requisites is determined by USGBC depending on the type of project, and includes but is not limited to the following areas:
 - Construction Pollution Prevention
 - Building Systems Commissioning
 - Energy Performance
 - Refrigerant Management
 - Storage and Collection of Recyclables
 - Indoor Air Quality Performance
 - Tobacco Smoke Control

Objectives
(continued)

- eliminating the use of the following materials:
 - Products containing asbestos, urea formaldehyde, polychlorinated biphenyls (PCBs), and/or chlorinated fluorocarbons
 - Solder or flux containing more than 0.2 percent lead and domestic water pipe or pipe fittings containing more than 8 percent lead
 - Paint containing more than 0.06 percent lead
- integrating life-cycle, cost-based analysis in investment decisions regarding products, services, design, and construction projects affecting building systems, long-term energy, water, and other utility operating costs, equipment, landscaping, operations, and maintenance.

The Smithsonian encourages:

- purchasing of recycled-content products as designated by the Environmental Protection Agency (EPA) through the Comprehensive Procurement Guidelines (CPG)
- maximizing the opportunity for contractors to bid recycled-content materials by including CPG items in the design specifications as long as they are available at a reasonable price
- eliminating products that emit off-gassing and noxious odors affecting indoor air quality

The Institution's budget requests to the Office of Management and Budget (OMB) will include funding necessary to follow the guidelines set forth in Executive Order 13123, *Greening the Government through Efficient Energy Management*, to the maximum extent practicable, including guidance concerning the construction and design of sustainable buildings.

Responsibilities

The following categories follow those established by USGBC in evaluating sustainable buildings performance:

- Site — Office of Project Management: Planning and Real Estate; Office of Facilities Engineering Operations: Office of Engineering, Design and

Responsibilities
(continued)

- Construction (OEDC) and Office of Safety, Health, and Environmental Management (OSHEM)
- Energy — Office of Facilities Engineering Operations: OEDC and Office of Facilities Management and Reliability (OFMR)
 - Materials — Office of Facilities Engineering Operations: OEDC, OSHEM, and OFMR
 - Indoor Environmental Quality — Office of Facilities Engineering Operations: OSHEM, OEDC, and OFMR

Additional Information

Smithsonian employees seeking additional information about the Institution's design sustainability policy may wish to refer to the following resources:

- *LEED Green Building Reference Guide*, developed by the U.S. Green Building Council
- Smithsonian Directive 414, *SI Energy Management Program and Water Supply Emergency Plan* (available on PRISM)
- Smithsonian Directive 410, *Facility Construction and Improvement Projects* (available on PRISM)
- International Building Code and International Existing Building Code
- Energy Policy Act of 2005 and Executive Order 13123, *Greening the Government through Efficient Energy Management*
- *HB-404, Smithsonian Operations and Maintenance Handbook*
- Council of Environmental Quality (CEQ), *Code of Federal Regulations* (CFR) Title 40, Parts 1500–1508: *Regulations for Implementing the National Environmental Policy Act*
- EPA, 10 CFR 40, 1.23, 1–4, 1–16: *Procedures for Implementing the Clean Air Act and the Federal Water Pollution Control Act*
- EPA, 40 CFR 50: *National Primary and Secondary Ambient Air Quality Standards*

CANCELLATION:
INQUIRIES:
RETENTION:

Not applicable
Office of Facilities Engineering and Operations (OFEO)
Indefinite. Subject to review for currency 24 months from date of issue.



SMITHSONIAN DIRECTIVE 500,

June 20, 2007,

Date Last Declared Current: May 3, 2011

SMITHSONIAN INSTITUTION LIBRARIES

Purpose	1
Mission	1
Background	1
Overview	2
SIL Administration and Operations	2
Responsibilities	3
Appendix 1: List of Smithsonian Institution Libraries	

Purpose

This directive establishes the responsibility of the Smithsonian Institution Libraries (SIL) for oversight and administration of all libraries within the Smithsonian Institution (SI).

Mission

As the largest and most diverse museum library in the world, SIL leads the Smithsonian in taking advantage of the opportunities of the digital society. SIL provides authoritative information and creates innovative services and programs for Smithsonian Institution researchers, scholars and curators, as well as the general public, to further their quest for knowledge. Through paper preservation and digital technologies, SIL ensures broad and enduring access to the Libraries' collections for all users.

Background

As directed by the Secretary of the Smithsonian on August 15, 1968:

"The Smithsonian Institution considers library services to be basic media for the increase and diffusion of knowledge among men. It is the policy of the Institution, therefore, to develop outstanding library collections and concomitant reference and

Background
(continued)

information dissemination services consistent with and in direct support of its programs.”

Secretary S. Dillon Ripley created SIL to bring order to a collection that had outgrown existing idiosyncratic systems, and reorganize it into a more useful library. At that time, books and journals were housed in more than 84 locations in seven cities. There was no centralized union catalog and large collections of unprocessed materials had accumulated.

Today, SIL is a centralized system of libraries that has evolved into an efficient and highly effective information and resource delivery service for the Institution and the general public. See <http://www.sil.si.edu> for a history of the Smithsonian library system.

Overview

SIL is a specialized research library system, providing library and information services to support the research, curatorial, exhibition, publication, and public service and education programs of the Institution. Its collections are available to Smithsonian researchers and staff, as well as outside scholars. SIL also shares its collections with the general public through interlibrary loans, the Internet, and public programs such as exhibitions, lectures, and publications.

**SIL Administration
and Operations**

SIL is organized into divisions and departments responsible for providing the Libraries’ services.

The Reader Services Division includes 20 libraries which meet the information and research needs of SI staff, curators, researchers, scholars, and the public by identifying, managing, locating, and delivering information in all formats.

The Technical Services Division acquires and catalogs materials to be added to SIL collections, in addition to seeking out and supplying information from a myriad of sources through interlibrary loans.

**SIL Administration
and Operations**
(continued)

The Digital Services Division is responsible for digital collections and SIL's Internet presence, and supports the integrated library system known as the Smithsonian Institution Research Information System (SIRIS). The Division is also responsible for conservation and preservation of special and general library collections.

The Administrative Services Department responsibilities include human resources management, budget formulation, execution, procurement, and shipping and receiving services for all programs of the Smithsonian Institution Libraries.

The Director's Office includes strategic planning, development, public affairs, exhibitions, and outreach programs.

Responsibilities

The Director, SIL, is responsible for overall planning, development, direction, and management of all programs and activities of the SI Libraries, under the broad oversight of the Deputy Under Secretary for Collections and Interdisciplinary Support. In addition, the Director, SIL, formulates the Libraries' policies, program goals, and objectives, and develops and recommends both short- and long-range program plans which encompass all aspects of SIL programs and activities.

SIL continually collaborates with museums and research centers throughout the Institution, as well as nationally and internationally, by supporting and adding value to their work and promoting the Libraries' services and visibility. In an ongoing effort to deliver improved information products, digital content, and resources, SIL monitors, adapts, and responds to changes in researchers' methods and expectations as they seek and exchange information.

SIL performs the following functions:

- Provides digital knowledge. SIL builds its capacity to collaborate with individuals, offices, and research centers throughout the SI community, and to

Responsibilities
(continued)

transform SI content and programs (e.g., collections and research products) into digital products that are readily available to the world.

- Delivers information. SI researchers demand regular, reliable, and instant access to information. SIL delivers credible information to internal and external users when and where it is needed, and from whatever source it can be obtained.
- Publicizes resources. SIL's expertise and collections offer value to the Institution and the world at large. SIL delivers experiences and products that meet the educational needs of the Institution's audiences. SIL responds to Smithsonian priorities on education, participating in national outreach and engagement of residents in the Washington, DC regional area through a well-designed website, first-class traveling and gallery exhibitions, and public programs. In addition, SIL works to secure a base of long-term support, through development activities.
- Promotes distinctive collections. Recognizing the national significance of its collections and the responsibility to provide good stewardship, SIL acquires, preserves, and catalogs collections in accordance with Smithsonian Directive 600, Collections Management, for current and future scholarship. SIL is a leading center for research in areas of Smithsonian scholarship. SIL print collections are well maintained and accessible to the SI community and the public through online finding aids, descriptive cataloging, and an integrated library system. SIL enriches its print collections by acquiring new and historic resources that fill obvious gaps in knowledge and enhance the research value of the whole collection.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 500, August 15, 1968
Smithsonian Institution Libraries (SIL)
Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 500
Appendix 1

June 20, 2007

LIST OF SMITHSONIAN INSTITUTION LIBRARIES

Anacostia Community Museum

Botany and Horticulture Library

Cooper-Hewitt, National Design Museum Library

Dibner Library of the History of Science and Technology

Earl S. Tupper Library, Smithsonian Tropical Research
Institute

Freer Gallery of Art and Arthur M. Sackler Gallery
Library

Hirshhorn Museum and Sculpture Garden Library

John Wesley Powell Library of Anthropology

Joseph F. Cullman 3rd Library of Natural History

Museum of African American History and Culture

Museum Support Center Library

National Air and Space Museum Library

National Museum of American History Library

National Museum of the American Indian Library

National Museum of Natural History Library

National Postal Museum Library

National Zoological Park Library

Smithsonian American Art Museum/National Portrait
Gallery Library

Smithsonian Environmental Research Center Library

Warren M. Robbins Library, National Museum of
African Art

CANCELLATION:

SD 500, August 15, 1968

INQUIRIES:

Smithsonian Institution Libraries (SIL)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 501

August 2, 1985

ARCHIVES AND RECORDS OF THE SMITHSONIAN INSTITUTION

Authority and Purpose	1
Definitions	2
General Policies	2
Smithsonian Institution Archives	2
Smithsonian Archivist	3
Authority and Responsibility of the Smithsonian Archivist	3
Smithsonian Institution Records	3
Donated Historical Materials	3
Deaccessioning and Disposal of Accessioned Material	4
Access and Reference Services	4
Outgoing Loans	5
General Records Disposition Schedules	5
Surveys and Assistance to Bureaus and Officers	5
Records Center	5
Continuous Custody and Accountability	5
General Administration	6
Relationship to Other Archival Centers	6
Appendix A: Glossary of Archival Terms	6

Authority and Purpose

The charter of the Smithsonian Institution states:

"The Secretary of the Board of Regents shall take charge of the building and property of the Institution, and shall, under their direction, make a fair and accurate record of all their proceedings, to be preserved in the Institution until no longer needed in conducting current business; ..." (20 USC 46).

The responsibility of the Secretary is further reinforced in the bylaws of the Board of Regents:

"The Secretary shall provide for maintaining the Institution's official records, including the proceedings of the Board of Regents and the Executive Committee (section 5.02)."

By this memorandum, as revised, policies governing the records of the Institution are reaffirmed, including a delegation of authority to the Smithsonian Archivist regarding the collection, preservation, use and disposition of official records. This memorandum sustains and describes:

- the responsibility of officers and other employees for records of the Institution;
- the Smithsonian Institution Archives (SIA);
- the authority and responsibility of the Smithsonian Archivist; and,
- the relationship of the Archives to other archival and documentation centers in the Institution.

Definitions

A glossary of archival terms and their particular meanings as used in this office memorandum, such as "archive," "document" and "record," appear in Appendix A of this memorandum.

General Policies

The Smithsonian Institution shall create and keep complete and accurate records of its activities; maintain the integrity of those records; and preserve records of enduring evidential or historical value.

All documents created or received by employees of the Smithsonian Institution in the course of official business are records of the Institution, and none may be disposed of except in accord with this memorandum and records' disposition schedules established by the Smithsonian Archivist.

Smithsonian Institution Archives

The Smithsonian Institution Archives is the official repository of all permanently valuable records of the Institution and of documents and other materials collected to assure comprehensive historical evidence of the activities of the Institution.

Smithsonian Archivist

The Smithsonian Archivist is the officer of the Institution appointed by the Secretary to plan and carry out archival policies and programs of the Institution and to manage the Smithsonian Institution Archives.

**Authority and
Responsibility of the
Smithsonian
Archivist**

Smithsonian Institution Records. The Archivist accessions into the Archives inactive Smithsonian records of permanent value according to records disposition schedules and other agreements with directors of bureaus and offices. In so doing, the Archivist assumes custody of and is accountable for the care and administration of such records on behalf of the Institution. The Archivist establishes and implements a program to preserve, arrange, and describe such records to assure their long-term survival and to facilitate their research and reference use.

Donated Historical Materials. Recognizing that many official files often omit important data and perspectives, recognizing that many research files contain a complex mix of personal and official records, and in order to avoid potential loss of significant documentation through the transfer of personal papers from the Institution, the Archivist is specifically authorized to seek and acquire, on behalf of the Institution:

- personal research records and other historical materials of curators, scientists, scholars, research associates, and officers of the Institution;
- oral history interviews with pivotal figures in the development of the Institution and its activities; and,
- records and other historical materials of professional and scholarly societies associated with the Institution in its research and other activities.

Acquisition of these materials is to be documented in each case by a deed or other instrument of transfer approved by the General Counsel. The Archivist is authorized to sign such deeds and transfers, accepting donated materials and terms and conditions of access and administration on behalf of the Institution, provided that the terms and conditions are in accord with the general purposes and best interests of the Institution.

However, it is understood that the Archivist will seek, through appropriate channels, specific approval for any acquisition

which may impose unusual burdens and/or restrictions on the Institution.

Donated historical materials are accessioned, preserved, arranged, and described to assure their long-term survival and to facilitate their research and reference use.

Deaccessioning and Disposal of Accessioned Material. The

Archivist may seek, through appropriate channels, authority from the Secretary to deaccession or otherwise dispose of records or other accessioned materials which upon careful examination he determines do not meet the general objectives of a comprehensive historical record as stated in the previous two subsections. Notwithstanding this limitation, the Archivist may, upon his own authority and at his discretion dispose of individual items that are redundant or superfluous to a particular record unit or collection, such as multiple identical copies of the same item redundant to the main record item, deteriorated items of no appreciable intrinsic value that have been copied and the copies retained for their informational value, and items so severely damaged and infested that they pose a danger to adjacent materials.

Access and Reference Services. The Archivist compiles and publishes information about the records and other historical materials in the Archives, distributes guides and finding aids, and furnishes data about holdings to users through national catalogs and automated information sharing networks.

For the convenience of Institution staff and outside scholars, the Archivist establishes and administers a central reading room for the direct examination of historical materials. The Archivist also plans, implements, and supervises a regular program of research assistance to administrators, curators, scientists, scholars, exhibitors, and other staff of the Institution. Routine procedures are set up and administered for answering telephone and mail reference inquiries about the holdings of the Archives and the history of the Institution.

In the absence of restrictions placed by transferring offices or donors, records and other historical materials accessioned into the Archives are considered open to research. Within limits properly imposed to protect privacy, personal property and proprietary rights, and restricted Institutional records, the Archivist provides reasonable and equitable research and reference service on materials in the Archives to staff of the Institution and to outside scholars, and keeps records of such activity.

Outgoing Loans. Loans of records and other historical materials from the Archives may be authorized by the Archivist for exhibits and other purposes consistent with the policies and interests of the Institution. In lending to outside parties, the Archivist shall first be satisfied that the recipient is capable of the proper care, protection, handling, exhibit, and return of the loaned material in original condition, and that the recipient employs prudent techniques and procedures in the transfer,

exhibit, or other use of the material.

General Records Disposition Schedules. The Archivist is authorized to devise and promulgate general records schedules for the disposition of common classes of routine records, recommending optimum retention periods, authorizing periodic disposal of inactive records not warranting permanent retention, and scheduling future appraisals and transfers of records to the Archives.

Surveys and Assistance to Bureaus and Officers. The Archivist designs and implements a program of periodic surveys of records in curatorial, administrative, and other offices to identify files of official records and potential sources of supplementary documentation, to discuss methods and practices of keeping, arranging, describing, and preserving records (including microform copying methods, materials, and criteria), and to discuss records disposition schedules and procedures with the principal officers concerned.

In consultation and cooperation with curators and other principal officers, the Archivist designs and promulgates specific records disposition schedules for individual offices, scheduling the disposal of records, the retention of records by the office, future appraisals, and transfers of records to the Archives.

In providing such assistance and devising records schedules, the Archivist shall take care that both the needs of the Institutional record and the research and operating needs of the discipline to which the specific bureau or office is dedicated are fully and properly served.

Records Center. The Archivist establishes and administers a records center for the temporary storage and handling of records and other materials scheduled for disposal, future appraisal, or future transfer.

Continuous Custody and Accountability. Continuous custody being a means of assuring the evidential integrity of the records and other materials, the Archivist is required to see

that complete and accurate transfer reports, loan receipts, reference use records, and other appropriate receipts and records establish and document the provenance and use of the materials.

General Administration. The Archivist manages the budget, personnel, property, and other resources assigned to the Smithsonian Institution Archives, including a central repository

and reading room and a remote records center. The Archivist cooperates with other officers of the Institution in designing, acquiring, installing, and operating security systems and devices to protect materials against theft, fire, flood, vermin, malicious damage, and other dangers.

Relationship to Other Archival Centers

A number of archival and documentation centers in the Institution share professional interests, standards, and document collecting with the Smithsonian Institution Archives, but these centers are not the official repository of Institutional records. They are normally parts of museums or research departments or are closely associated with them, and are responsive to the academic disciplines of their principals. Their collecting and reference services support particular scholarly themes or particular object, specimen, or artifact collections. Among such centers are the Archives of American Art, the National Anthropological Archives in the National Museum of Natural History, and the Archives Center in the National Museum of American History.

Whenever these centers contain official records of the Institution, as defined in General Policies, above, their administration of those records is subject to the provisions of this memorandum. The authority of the Archivist does not extend, however, beyond the official records to other documentation collected and administered by these centers.

Appendix A: Glossary of Archival Terms

Access:

Policies and procedures governing research use of archives; the ability of researchers to gain entry to the sources needed for their studies.

Accessioning:

Assumption of permanent custody and administration of records and other historical materials by an archives.

Acquisition:

Collection and assumption of title, dominion, and custody of privately-owned documents and other historical materials by an archives.

Alienation:

Unauthorized removal or disposition of documents which are the property of the Institution (ranging from theft to inadvertent removal with private papers).

Appraisal:

Determining that a document is or is not of sufficient evidential or historical value to warrant its retention.

Archives:

Permanently valuable records and other historical materials preserved indefinitely for future reference; the place where such materials are kept; the staff of employees devoted to the care and administration of such materials.

Archivist:

One professionally trained and employed in managing an archives or applying archival techniques to records and other historical materials.

Disposal:

Discarding or destroying inactive records or other historical materials whose value is insufficient to warrant further retention, either for current business or for future use.

Disposition:

The fate of a document, whether it be disposal, retention, accession into the archives, donation elsewhere, etc.

Document:

A general term for historical evidence in durable language or image form, including both official and personal records, traditionally limited to written documents but increasingly applied to documentation in film, tape, disc, and other media.¹

Historical Materials:

All records, documents, artifacts, and other materials preserved for their intrinsic, exhibit, evidential, or other historical value.

Preservation:

Improving the long-term survivability of historical materials by proper storage, handling, and application of techniques such as fumigation, deacidification, encapsulation, microform copying, and the like.

Record:

A document describing or recording the official business of an

¹ Documents, like artifacts, are a subset of historical materials; and records are a special subset of documents distinguished for their official or quasi-official character and legal or evidential value.

organization or person [Some records are referred to as "machine-readable" since they require mechanical or electronic devices to be "read."]

Records Disposition Schedule:

A timetable of actions authorized to be taken in the of disposition records; sometimes seen as "records schedule," it may be either general (applying to common classes of widely-held routine records) or specific (applying to the particular records of an individual office).

Replevin:

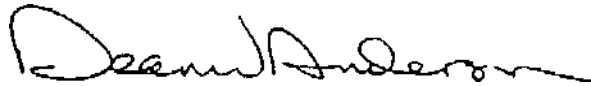
Official, legal recovery of alienated documents or other historical materials by the legal owner.

Repository:

A place where records and other historical materials are stored and administered for research sometimes called a "depository," and synonymous with the second definition of "archives," above.

Retention:

Keeping a document for immediate business or historical research, either in the officer of origin, a successor office, or the archives.



Dean W. Anderson
Acting Secretary

CANCELLATION:
INQUIRIES:
RETENTION:

OM 766 (Rev.) of 11/4/76
Smithsonian Institution Archives
Indefinite. Subject to review for currency 18 months from the date hereof.

GLOSSARY OF ARCHIVAL TERMS

<u>Access:</u>	policies and procedures governing research use of archives; the ability of researchers to gain entry to the sources needed for their studies.
<u>Accessioning:</u>	assumption of permanent custody and administration of records and other historical materials by an archives.
<u>Acquisition:</u>	collection and assumption of title, dominion, and custody of privately-owned documents and other historical materials by an archives.
<u>Alienation:</u>	unauthorized removal or disposition of documents which are the property of the Institution {ranging from theft to inadvertent removal with private papers}.
<u>Appraisal:</u>	determining that a document is or is not of sufficient evidential or historical value to warrant its retention.
<u>Archives:</u>	permanently valuable records and other historical materials preserved indefinitely for future reference; the place where such materials are kept; the staff of employees devoted to the care and administration of such materials.
<u>Archivist:</u>	one professionally trained and employed in managing an archives or applying archival techniques to records and other historical materials.
Disposal:	discarding or destroying inactive records or other historical materials whose value is insufficient to warrant further retention, either for current business or for future use.
Disposition:	the fate of a document, whether it be disposal, retention, accession into the archives, donation elsewhere, etc.
Document:	a general term for historical evidence in durable language or image form, including both official and personal records, traditionally limited to written documents but increasingly applied to documentation in film, tape, disc, and other media.*
Historical: <u>Materials:</u>	all records, documents, artifacts, and other materials preserved for their intrinsic, exhibit, evidential, or other historical value.*
<u>Preservation:</u>	improving the long-term survivability of historical materials by proper storage, handling, and application of techniques such as fumigation, deacidification, encapsulation, microform copying, and the like.

* Documents, like artifacts, are a subset of historical materials; and records are a special subset of documents distinguished for their official or quasi-official character and legal or evidential value.

Record: a document describing or recording the official business of an organization or person [Some records are referred to as "machine-readable" since they require mechanical or electronic devices to be "read."]

Records
Disposition
Schedule: a timetable of actions authorized to be taken in the of disposition records; sometimes seen as "records schedule," it may be either general (applying to common classes of widely-held routine records).or specific (applying to the particular rec6rds of an individual office).

Replevin: official, legal recovery of alienated documents or other historical materials by the legal owner.

Repository: a place where records and other historical materials are stored and administered for research sometimes called a "depository," and synonymous with the second definition of "archives," above.

Retention: keeping a document for immediate business or historical research, either in the officer of origin, a successor office, or the archives.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 502,

April 7, 2009,

Date Last Declared Current: December 6, 2011

CELLULOSE NITRATE STILL PICTURE AND MOTION PICTURE FILM

Background	1
Policy	2
Responsibilities	2
Enforcement	2
Recommended Implementation Steps	2
Support Services for Storage and Handling of Cellulose Nitrate Film	3

Background

The storage of all cellulose nitrate still picture and motion picture film is regulated by National Fire Protection Association (NFPA) 40 — Standard for the Storage and Handling of Cellulose Nitrate Film. Familiarity with this standard is an essential component of collections management of cellulose nitrate film. In addition, transportation of cellulose nitrate film is regulated by the Department of Transportation (DOT *Code of Federal Regulations* [CFR] 49).

Under normal museum storage conditions, cellulose nitrate film (nitrate) decomposes and may deteriorate to the point of being unstable. As it deteriorates, it emits acidic gasses that can damage nearby materials. Research has shown that severely deteriorated nitrate film stored at more than 100° F for more than one week may spontaneously combust (National Archives and Records Administration, 1949); furthermore, in the event of a fire, improperly stored nitrate film could dramatically increase damage to surrounding collections.

The Smithsonian Institution continues to identify and segregate cellulose nitrate film since the initial issuance of this directive in 1982. Storage of nitrate film is a problem for all museums, archives, and libraries,

Background
(continued)

because new collections are received and new holdings of nitrate film may be found. Therefore, a vigilant Smithsonian policy for the identification and disposition of nitrate film is necessary.

Policy

Smithsonian policy requires prompt segregation of all still and motion picture nitrate film from the collections, and removal of the nitrate film to storage that conforms with the provisions of NFPA 40 (as maintained by the Office of Safety, Health, and Environmental Management [OSHEM]).

Responsibilities

Heads of museums, research centers, and offices are responsible for the implementation of this policy. This responsibility includes training staff to identify nitrate film, and to establish and implement procedures for the removal, copying, storage, or destruction of nitrate film. For additional resources, see the OSHEM *Smithsonian Institution (SI) Safety Manual*, Chapter 24, Collection-based Hazards.¹

Enforcement

As a health and safety matter, all storage of nitrate film is to be reported to OSHEM per the *Smithsonian Institution Safety Manual*, Chapter 24, and monitored by OSHEM and the unit safety coordinator.²

**Recommended
Implementation
Steps**

Accepted practice in museums, libraries, and archives is to copy nitrate film onto stable film bases (silver-halide polyester film) or to digitize the images to preserve and make accessible historically significant images. Proper collections space, consisting of cool or cold room environments, is critical for long-term preservation of originals before and after duplication. For highly valuable nitrate film, retention of the original after duplication is preferred, especially if digital surrogates have been made. Other guidelines are as follows:

^{1, 2} See http://ofeo.si.edu/safety_health/docs/safety_manual_07/ch_24_collections_based_hazards.doc. This link was verified as of June 18, 2012.

**Recommended
Implementation
Steps (continued)**

- **Reformatting.** Contract vendors may provide duplication services.
- **Transportation within units, to storage, or to reformatting vendors.** All transportation of nitrate film is regulated by DOT CFR 49. Nitrate film is considered a class 4.1 flammable solid. When nitrate film is transported using a commercial vendor, packing must comply with DOT Shipping Regulations in 49 CFR 172. When nitrate film is transported by Smithsonian employees in Smithsonian vehicles, the driver must carry the Material Safety Data Sheet (MSDS) for cellulose nitrate film, and an inventory of the collections being transported. In addition, the container(s) must be labeled to indicate the presence of cellulose nitrate.
- **Storage.** All storage shall comply with the *SI Safety Manual*, Chapter 36 — Fire Protection³, and NFPA 40.
- **Disposal.** When nitrate materials are identified for de-accession, the original nitrate film becomes a “hazardous waste,” which is strictly regulated by the Environmental Protection Agency under the Resource Conservation and Recovery Act, and it is managed according to hazardous waste disposal procedures established by the Institution (*SI Safety Manual*, Chapter 29 — Hazardous Waste Management)⁴, and by federal, state, and local regulations regarding the disposal of hazardous waste.

**Support Services
for Storage
and Handling
of Cellulose Nitrate
Film**

The Smithsonian Institution Archives (SIA) is the liaison for an off-site nitrate film storage facility that conforms to NFPA 40. Museums, research centers, and offices that want to store nitrate film in this facility should arrange transportation, storage, and inventory

³ See http://ofeo.si.edu/safety_health/docs/safety_manual_07/ch_36_fire_protection.doc. This link was verified as of June 18, 2012.

⁴ See http://ofeo.si.edu/safety_health/docs/safety_manual_07/ch_29_hazardous_waste_management.doc. This link was verified as of June 18, 2012.

**Support Services
for Storage
and Handling
of Cellulose Nitrate
Film** (continued)

control of the film with the SIA's Technical Services Division. Space in this remote secure storage facility is limited.

The SIA has developed a protocol that uses Fourier Transform Infrared (FTIR) spectroscopy for the nondestructive identification of cellulose nitrate film. The Archives can be consulted regarding identification, reformatting, storage, and disposal of cellulose nitrate film.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 502, April 5, 2005
Smithsonian Institution Archives (SIA)
Indefinite. Subject to review for currency 24 months from date of issue

**MANAGEMENT OF ARCHIVES AND SPECIAL COLLECTIONS
IN THE SMITHSONIAN INSTITUTION**

Purpose	1
Background	2
Scope	2
Applicability	3
Roles	3
Responsibilities	4
Definitions	5
Policy Requirements	6
Principles	8
Procedures	9
References	13

Purpose

This directive outlines broad responsibilities for the management of the Smithsonian Institution's archival, manuscript and special collections. These collections do not include the official records of the Institution (which are covered under SD 501, *Archives and Records of the Smithsonian Institution*).

SD 503 further defines for Smithsonian archival and special collections the policies, guidelines and standards enumerated in SD 600, *Collections Management*, and SD 500, *Smithsonian Institution Libraries* (which addresses special collections administered by the Smithsonian Institution Libraries). SD 503 goes beyond SD 600 by prescribing archival, manuscript and special collections' roles and responsibilities separate from a larger SD 600 collecting unit. SD 503 is to be referenced in all governing materials for archival, manuscript and special collections, such as a Collections Management Policy, to ensure Institution-wide cohesive management and support of these units.

Background

Archives, manuscripts, and special collections enrich the research base of the Smithsonian Institution with meaningful historical, scientific, cultural and fine arts documentary evidence, and complement collections of objects and specimens. They have unique management requirements and considerations in addition to standards for other components of the Smithsonian's National Collections, as indicated in SD 600, *Collections Management*. These requirements must be met if archival resources are to adhere to professional standards and achieve their full potential for Smithsonian and public research.

The parameters for adhering to these requirements and standards are as follows:

- **Who:** Smithsonian archival, manuscript, and special collection repositories can be independently managed research entities or they can be managed under a larger collecting unit as defined by SD 600. Archivists who manage archival collections can be directors, department heads, managers, supervisory personnel, or specially trained staff, including museum specialists, librarians, curators, registrars and others.
- **What:** Archives may include a diverse range of formats, including architectural drawings, audio and video materials, business records, correspondence, diaries, digital files, documents, maps, manuscripts, music scores, photographs, rare and unique printed and published materials (i.e., broadsides, pamphlets, etc.), research files, scrapbooks, sketches, and sketchbooks.
- **Where:** Unique collections of archival materials are found in numerous Smithsonian collecting units, research centers, libraries, curatorial divisions, departments, program offices, and support offices.

Scope

This directive is specific to the management of archival collections acquired by authorized Smithsonian collecting units as listed in the *SD 600 Implementation*

Scope (continued)	<i>Manual</i> . Guided by the policies of both SD 600, <i>Collections Management</i> , and SD 501, <i>Archives and Records of the Smithsonian Institution</i> , the implementation of SD 503 will ensure that archival collections are carefully managed through the application of standard archival principles.
Applicability	This directive addresses those who manage archives and those at higher levels who manage units or direct programs that include archives.
Roles	<p>Collecting Unit Directors are responsible for unit policy guidance, program direction and planning, and budget, personnel, facilities, and equipment support to meet the ongoing needs of the archival and special collections and to carry out the collections management requirements established in SD 600, <i>Collections Management</i>. They establish, implement, and review their unit's collections management policy. They ensure unit compliance with SD 600, <i>Collections Management</i>, the <i>SD 600 Implementation Manual</i>, and their unit's Collections Management Policy. They delegate authority and assign collections responsibility to the appropriate unit staff.</p> <p>Archivists are responsible for carrying out their archival collections management responsibilities to ensure the implementation of established archival management policies and procedures. They adhere to applicable professional practices. They are responsible for the proper custody, management, and preservation of collections, and provide accessibility consistent with preservation, security, ethical and legal considerations. They are responsible for the integrity and accuracy of collections information.</p> <p>Archives Support Staff assist in the custody, administration, preservation and use of archives.</p> <p>The Director of the SI Archives is responsible for monitoring the implementation of this directive and recommending revisions to it, as appropriate.</p>

Roles (continued)

Related Entities:

The ***Smithsonian Collections Advisory Committee (SCAC)*** is an Institution-wide body that serves as an advisor to Smithsonian executive leadership and senior management on collections issues. It assists in establishing a framework for setting the Institution's priorities and meeting defined collections stewardship responsibilities.

The ***Smithsonian Institution Archives and Special Collections Council (SIASC)***, established in 1987 at the direction of the Secretary, provides a forum for open discussion regarding experiences, interests, and concerns relating to the Institution's archives and special collections. It prepares archival management policies, procedures, manuals, and other guidance for those at the Smithsonian who manage archival collections.

Responsibilities

In addition to following all legal and ethical obligations outlined in SD 600, *Collections Management*, the acquisition and possession of archival collections impose responsibilities to provide proper management, preservation, and use of the collections and their associated information.

Archival Collections Management Responsibilities:

Archivists are responsible for supervising staff and maintaining facilities. Archivists apply archival principles, standards, procedures, and techniques to documents in any medium.

Archivists appraise the historical value of archival collections and accession, arrange, describe, and preserve them. They also acquire, register, catalogue, lend, and exhibit archival holdings.

In addition, archivists provide research and reference services according to standard archival principles and procedures, and make collections available for a variety of purposes, including publications, exhibitions, and documentaries.

Responsibilities
(continued)

Archivists maintain a high level of experience and skills, requiring continued education to keep up to date with the latest standards, theories, technology, and requirements within an evolving field. Archivists are continually researching and experimenting with emerging technology to further their collection's permanent future use by ensuring preservation and fostering access for the public.

Archivists are advocates for the collections they maintain, providing outreach to advertise and support their collections and inform management of their collection needs.

In support of the Smithsonian's mission to increase and diffuse knowledge, archivists may partner with universities to help educate the next generation of archivists by providing interns with hands-on experience in archival management policies and procedures.

Definitions

Although there are distinctions between official archives, manuscript collections, and special collections, the overarching term "archives" is used in this directive.

Archival Records (or Archives): Materials created or received by a person, family, or organization, public or private, in the conduct of their personal and/or professional affairs, and preserved because of the enduring value displayed in the information they contain or by the time, events, or subject matter they document.

Archivists: can be directors, department heads, managers, supervisory personnel, or specially trained staff. They have a combination of advanced formal education and specialized work experience in the field with skills in management, organization, and preservation of archives. Depending on the grade level, archivists are now required to obtain a Bachelor's or Master's degree with an Archives concentration and need specialized work experience before qualifying for

Definitions
(continued)

a position. Depending on the position, a second advanced degree in a particular subject field may be a prerequisite as well.

Archival Management. The general oversight of a program to appraise, acquire, arrange and describe, preserve, authenticate, and provide access to permanently valuable records.

Archival Repository (or Archives). The division within an organization responsible for maintaining the organization's records of enduring value; the place where archival records are stored and maintained.

Manuscript Collections: Collections of personal or family papers. Although "manuscript" literally means "handwritten," "manuscript collection" is often used to include collections of mixed media in which unpublished materials predominate. They may also include typescripts, photographs, diaries, scrapbooks, news clippings, and printed works.

Special Collections. Contain rare and unique materials that are usually built around a particular subject or purpose.

Assembled or Artificial Collections. Collections of materials, typically with a thematic focus, that are gathered without regard to their original provenance from multiple sources by a collector who is rarely their creator.

Policy Requirements

Those who manage archives must establish and implement the following policy statements among their routine archival management requirements. These policies, appropriate to the character and size of a unit's collections, provide guidance and procedures for collecting, archives management, and reference activities. At a minimum, policies must be reviewed and approved by the collecting unit director to ensure that they are in keeping with Smithsonian policies, local unit policies and archival principles and standards. If

Policy Requirements
(continued)

applicable, approval may also be required from other parties, including the governing authority, National Collections coordinator, appropriate Under Secretary, and Office of General Counsel.

Archival units that fall under a larger parent organization, such as an authorized Smithsonian collecting unit, research center or office, must ensure that their archival management issues are reflected in the policies of the organization as a whole. They should promote coordination and communication in order to strengthen their role and place within their organization. All SD 600-designated collecting units must develop and implement an approved, up-to-date:

- Collections Management Policy (CMP) that explains the professional standards a collecting unit follows for collection items in its care and custody, and that establishes a framework for collections development, management, care, and use.

See the *SD 600 Implementation Manual* for a detailed explanation of the following CMP components:

- Statement of Purpose
- Primary Statement of Authority
- Definition of Collections
- Scope of Collections
- Collections Plan
- Acquisition and Accessioning
- Deaccessioning and Disposal
- Preservation
- Collections Information
- Inventory
- Risk Management and Security
- Access
- Loans
- Intellectual Property Rights Management
- Ethics
- Monitoring and Revision of Policy
- Exceptions to the Collections Management Policy

Policy Requirements
(continued)

With regard to those archival units that fall under a larger parent organization, the collections management policy components listed above may be created as separate documents or as sections of a single document as appropriate to the local circumstances of the parent organization.

Principles

Archival Principles. Archives, manuscripts, and special collections require the application of specific logic, methods, techniques and standards that are used to make the best and most effective use of archival collections and to preserve the materials' authenticity, context, and intellectual character. These archival principles are applied *in addition to* fundamental standards for other components of the Smithsonian's National Collections as defined in SD 600, *Collections Management*. Archival principles are tailored to the unique circumstances of a particular archival collection. Very broadly, they include:

- Provenance. Keeping record groups intact so they can be clearly and unambiguously defined by and identified with their entity of origin.
- Original Order. The requirement that files and documents be kept in the same order in which they were originally maintained and used by their originator(s) in order to preserve the sequence of historical actions or evidence. Original order is applied and followed unless there is incontestably persuasive evidence that an alternative is better in the long-run interests of research and worth the loss of evidence that rearrangement inevitably entails.
- Integrity. Maintaining a document in its original material form or collections in their entirety in order to preserve their unique evidence.
- Hierarchical Management. Managing archives by proceeding from the general or aggregate to the particular. Parts are always considered in the context of the whole.

Procedures

Archives Management involves policy direction and administration of an archival repository, its contents, staff, and facilities. The comprehensive application of archival principles and techniques to archival holdings, *in addition to* fundamental standards and guidelines for other components of the Smithsonian's National Collections, as indicated in SD 600, *Collections Management*, ensures that the records are accounted for, maintained, preserved, and available for research use. At a minimum, the collections management cycle includes appraisal, accession, processing, arrangement, description, preservation, storage, access, and inventory. It may also involve cataloguing as a means of enhanced access and digitization as a tool for preservation and/or enhanced access.

The following are primarily archival management procedures:

- Collecting and Accessioning. Goals and priorities in support of the Smithsonian's mission and consistent with the Collections Plan of the independent archival repository or parent organization must be identified and implemented. Archivists identify and track potential sources of collection materials that may support and contribute to the collecting interests of the independent repository or parent organization. All transactions with donors and vendors, potential or actual, must be recorded and documented.

In order to avoid competing for the same archival resources, archivists coordinate solicitation and acquisition with the curatorial divisions within their parent organization as well as with other relevant collecting units within the Smithsonian. Archivists should determine that their unit has sufficient resources to manage and maintain a collection before it is acquired.

- Administrative Control requires that the quantities of holdings, sources, legal status, use parameters, conditions, locations, levels of processing, and reference use be known, recorded, and reported.

Procedures
(continued)

All actions taken to acquire collection materials, establish ownership, and manage the materials must be carefully accounted for by a complete and continuous chain of documentation of all actions affecting and respecting the archives.

- Intellectual Property Rights. Archivists apply and regulate any use parameters or restrictions required by the creator or donor of an archival collection.
- Intellectual Control requires that archivists know what materials and information are in their collections, recognize the intrinsic and informational values of the collections, and generate catalogue records, guides, registers or descriptive finding aids that inform users about the holdings.
- Accountability and Risk Management. It is important that archives be placed in a secure location within a storage facility, museum, office, or library. Archivists are accountable for aggregate record groups or collections as well as the individual documents that make them up. Archivists must have and carry out procedures to identify, protect, and account for all items. To do so, they need catalogue records, finding aids, careful holdings maintenance, orderly re-filing procedures, and detailed records of research use. Archives staff must also perform periodic inventories to account for archival holdings. They must monitor on-site users to ensure that archival holdings are handled properly, filed correctly, and not subjected to theft or vandalism. Particularly rare or valuable documents may be reproduced for reference use so that they can be removed from circulation and segregated in highly secure storage.
- Preservation. Archivists are responsible for protecting, stabilizing and maintaining the physical condition of archival collections so they may be available for research indefinitely. Proper environmental and storage conditions, housing of documents, and re-filing to maintain order and

Procedures
(continued)

neatness are essential. Archivists must plan and implement a continuing program of preservation work and holdings maintenance, including not only document preservation and conservation but also storage and environmental conditions that prolong document life. They may also digitize collections (especially those heavily in demand by researchers) in order to minimize their physical handling and to provide ready access to them.

- Processing. An archival collection is arranged, described, and housed so that it can be made readily available for research use. These steps may be undertaken concurrently or in phases by archives staff. Select items may be culled (removed and disposed) from an archival collection during processing activities in accordance with appraisal standards and best practices. Culled items may include duplicate material, items whose physical composition or condition may be harmful to other collections, and extraneous published materials that are not rare.
- Collections Information. Archivists must be able to inform others about their unit's holdings. A repository-level guide that identifies each record group or collection, source, legal status, volume or quantity, chronological span, and a general summary of the contents and their scope should be the minimum expectation for any archival repository. Finer detail in catalogue records, finding aids, and inventories should be documented and made widely available to users to the extent that staffing levels and resources permit.

Automated Archival Collections Management Systems (ACMS) assist in managing collections information. A number of national standards help maintain the integrity of the archival field and promote the high functionality of archival collections. The following standards are some of those which are typically incorporated into workflows involving collections information relating to archives and special collections:

Procedures
(continued)

- Machine Readable Cataloguing (MARC)
 - Describing Archives: A Content Standard (DACS)
 - ISAD(G): General International Standard Archival Description
 - Encoded Archival Description (EAD)
 - Moving Image Collections Cataloguing and Metadata Portal
 - Dublin Core
 - Cataloguing Cultural Objects: A Guide to Describing Cultural Works and Their Images (CCO)
 - Graphic Materials: Rules for Describing Original Items and Historical Collections
-
- Access. Archives staff are responsible for providing access, consistent with unit policy, to collections to the extent that they also ensure their security and preservation. Access may occur on site or through technologies that provide remote access. Archives staff alert users to any use restrictions and provide them with explicit instructions on proper citation of sources. Archivists enforce any donor or use restrictions and exercise caution when dealing with cases of collection use where privacy rights or cultural sensitivity may come into play. Archival collections managed by units other than the Smithsonian Institution Archives are not subject to SD 807, *Requests for Smithsonian Institution Information*.
 - Outreach. Archivists take steps to make their holdings known to users (Smithsonian staff, researchers, Fellows, students, general public, et al.) through both traditional and exploratory methods, including websites, online catalogues, publications, exhibitions, and emerging technologies that repurpose the collections.
 - Planning. Effective archives management requires periodic review of program performance, emphasis, direction, and compatibility with Smithsonian and parent organization goals; projections of holdings growth by type and volume; and plans to meet

Procedures
(continued)

emerging needs, conditions, and technologies. Based on these reviews, it is the responsibility of the archivist to prioritize plans and prepare budgets to acquire and apply resources to archival work in a systematic, economical, and orderly manner.

References

Additional information on archives management can be found on the following websites.

- Smithsonian Institution Archives:
<http://siarchives.si.edu/>
 - Society of American Archivists: www.archivists.org
 - Rare Books and Manuscripts Section of the Association of College and Research Libraries:
www.rbms.info/
-

CANCELLATION:
INQUIRIES:
RETENTION:

SD 503, September 26, 1990
Smithsonian Institution Archives (SIA)
Indefinite. Subject to review for currency 24 months from date of issue.



SMITHSONIAN INSTITUTION

OFFICE YEMOILANDUM 845

October 10, 1990

TO: Heads of bureaus and major offices

SUBJECT: Procurement And Use Of Archival Quality Alkaline Paper
For Permanent Records

1.0 POLICY AND GENERAL PROVISIONS

1.1 Policy and Justification. A Smithsonian record worth saving for future reference is worth the cost and effort of putting it on an archival quality medium, specifically durable, permanent alkaline paper or archival quality microfilm. To do so offers records the best chance to endure for centuries, not merely decades. The consequence of not doing so is the certainty that records will deteriorate rapidly and not be available for future research except at great and perhaps intolerable expense of remedial conservation and copying.

Smithsonian records identified as "permanent" or "archival" (see Sections 2. and 3., below) shall be on permanent, durable, archival quality, alkaline paper or copied onto permanent, durable, archival quality microfilm. A manual being sent under separate cover provides bureau and office directors with standards and specifications for procurement of archival quality records media and for housing and storing records so as to give them the best chances for long-term survival for future reference. This manual is titled "Standards for Material, Processing and Storage of Archival Records Resources".

In addition to the CAL opinion cited in 1.2, below this memorandum relies heavily for its authority on Preservation of Historical Records, a 1986 report to the National Archives and Records Administration by the Committee on Preservation of Historical Records of the National Research Council, published by the National Academy Press, Washington, DC, and on other studies and technical papers of the National Archives.

It is a reasonable conclusion from these studies that quality control of paper documents at their points of origin, careful handling during their useful lives in the workplace, and archival quality storage and holdings maintenance of paper records offer the best and least expensive means of assuring long-term survival of records. Silver halide microfilm, kept under pristine, stable environmental conditions is the preferred alternative when necessary. Archival quality electrostatic copying onto archival quality paper is also an acceptable alternative.



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The same studies also advise that other popular media, such as magnetic tape or laser disc do not offer the durability, permanence, or economy necessary to economical preservation of permanent records, whatever other good uses they may have. The studies further demonstrate that massive retroactive copying, preservation, and copying, whatever the medium, are prohibitively expensive.

1.2 Use of Recycled Paper. Consideration for ecology and conservation of natural resources urges maximum use of recycled paper and paper products such as file folders at the Smithsonian. However, recycled paper as presently manufactured is not proven to be either permanent or durable enough to meet archival standards. It should not be used for permanent archival records of the Institution. Documents that are not archival and need not be saved for future reference may be on recycled media. Permanent records and recycled paper documents should be kept separate. Acid and other impurities in recycled paper may destroy not only that paper but may also damage or destroy adjacent materials.

The Smithsonian Conservation Analytical Laboratory considered the issue of recycled paper as a medium for archival records in 1989 and offered the opinion that (at least for the present) recycled paper is likely to be unsuitable for durable and permanent archival records on either or both of two grounds: either it contains impurities that accelerate inherent deterioration, or its fibers are too short for reliable durability. CAL further advises that the issue should be re-examined periodically to determine if in the future commercial vendors of recycled paper can and do meet archival standards for durability and permanence.

1.3 Application. This policy applies to all bureaus and offices of the Smithsonian Institution. Each should make all reasonable efforts to insure that procurement actions and office routines support and implement the policy.

Procurement officers are warned that even the best of vendors of conservation supplies do not always meet archival standards with every batch of material, and periodic testing (which may be contracted out to a commercial laboratory) is necessary to ensure that archival quality is being received and used.

2.0 SCOPE OF COVERAGE: Archival and Non-archival Records

2.1 Smithsonian Permanent or "Archival" Records. Office Memorandum 766 defines Smithsonian Institution records as "all documents created or received by employees of the Smithsonian Institution in the course of official business."

Permanent records or archival records are those Smithsonian records that are worth keeping indefinitely as evidence of the Smithsonian's work and for the information they contain. Designation of records as "permanent" is not imposed arbitrarily. It results from negotiated appraisal of evidential and informational values of the records by staff of the unit that used the records and staff of the Smithsonian Archives. The decision is made on the value of whole file series because the cost of item-by-item appraisal would be prohibitive.

Permanent archival records require the special attention described herein if they are to survive to serve the Institution indefinitely. Whether they survive or not and for how long is directly proportional to the degree of cost, care, and effort Smithsonian staff devote to that end. It is far cheaper to make this investment early in the life of a document, at its time of creation. The notion of "mass conservation" is self-deceiving; conservation is item-by-item, labor-intensive work. Bureaus and offices and those who procure office supplies and/or create or receive records that are permanent or archival should make every reasonable effort to assure that the paper used meets the standards in the manual referenced in Section 1 above and that they are appropriately housed and stored to assure longevity.

2.2 Non-archival Records. Expendable documents, including reference copies and the general run of issuances printed and widely distributed and other documents that the Smithsonian Institution Archives agrees are "non-archival", need not be held to the standards set by this memorandum. They may be on recycled paper.

However, even these expendable items are retained for a time for reference. They are subject to wear and tear and must be replaced periodically at the convenience of the office holding the records. They should be kept separate from permanent records.

3.0 CLASSES OF RECORDS THAT REQUIRE PERMANENCE AND DURABILITY. The following classes of records are among those most often designabed as permanently valuable or archival. This is not an exhaustive or exclusive list; it should be used as a guide to local decisions about whole series of records-making and records-keeping.

3.1 Muniments and Vital Records

. all original or record copies of major documents of charter, entitlement, authorization, etc.; all original agreements between the Institution or its offices and bureaus and other organizations or individuals, foreign or domestic; and all deeds, wills, and other vital records of the Smithsonian Institution and its several bureaus and offices.

3.2 Records of the Board of Regents

- all correspondence, agenda, minutes, and other records of the activities of the Board of Regents and its committees.

3.3 Records of the Secretariat

. all incoming and outgoing correspondence and reports of the Secretary of the Smithsonian Institution and his or her principal assistants, including the Undersecretary, Assistant Secretaries, and other members of the Management Committee or its equivalent.

3.4 Registrarial Records

. all permanent documentation of the acquisition, accessioning and management of the national collections, including but not limited to correspondence on acquisitions, provenance, deeds, loans, appraisals, receipts, conservation and restoration, etc.

3.5 Litigation Records

- all records having to do with Institutional litigation and negotiations over litigation, except those specifically designated for destruction by the General Counsel.

3.6 Fiscal and Fiduciary Records

. all records having to do with the proper discharge of the Institution's fiscal and fiduciary responsibilities except such receipts as may be disposed of after audits and other statutory and regulatory requirements have been satisfied.

3.7 Official Personnel Files

. all centrally-maintained official employment records contained in individual named personnel files (but not necessarily working files in operating offices unless they have unique and significant historical information to contribute).

3.8 Principal Correspondence of Major Units

- all incoming and outgoing correspondence and reports of units at the curatorial division or department level or above and/or at the level of branches of administrative and other support offices or above, including but not limited to letters, memoranda, reports of research results,

transactions with clientele and other Institutional entities, summary reports of activities and the like to produce a definitive record of the activities of the unit.

3.9 Record Sets of General Issuances

. all record sets (original master sets) of general issuances such as but not limited to annual reports, Smithsonian Office Memoranda, Smithsonian Staff Handbooks, the Staff Bulletin, budget and planning documents submitted to the Regents, OMB and the Congress, and important supporting documents, press releases, and other records that are kept by their issuing offices (designated by the Smithsonian Archives as "offices of record" for the general issuances in question). The general print run of such issuances printed and distributed may be on inferior paper, including recycled stock if it is available, as long as the record set is printed or copied on archival quality paper.

3.10 Architectural and Engineering Drawings

. all original architectural and engineering drawings, plans and elevations, of Smithsonian buildings and modifications to existing buildings, landscape plans, and other similar documents. The Office of Design and Construction is urged to make electrostatic copies on mylar for general reference as part of each project's budget and routine tasks, and to transfer originals to the Smithsonian Archives at the earliest convenience.

3.11 Scheduled Archival Records

. any other files that have been designated as "archival" and scheduled for transfer to the central Smithsonian Archives in general disposition schedules or in specific surveys and disposition agreements or schedules agreed to by the unit surveyed.

4.0 INCOMING CORRESPONDENCE: Common Sense and Prudent Handling. Smithsonian units clearly have no control over material quality of incoming correspondence which accounts for a substantial portion of any unit's files. This memorandum, therefore, applies principally to records created by Smithsonian units. At the same time, units are urged to take prudent care of incoming correspondence so as to offer the best chances for its long-term survival, especially with incoming documents whose intrinsic value or evidential value as originals may be critical to future Smithsonian work. Accordingly, the following guidelines are offered for those who work with Smithsonian records and files.

Rough handling, stapling, clipping, and careless or hasty filing contribute significantly to document deterioration. Careful, patient, and neatly ordered filing, makes a major contribution to document longevity. It should be encouraged in the routine activities of all offices and personnel.

Items of high intrinsic value or high evidential value, where there is a long-term Smithsonian interest in the survival of the original, no matter how many copies may exist, require extra attention and care. Whenever possible, they should be placed in separate folders, or buffered by the insertion of acid-free paper stock between them and other, non-durable documents in the file.

Whenever it is feared that excessive handling or other rough usage may threaten the longevity of an important document, it is prudent to make an archival-quality electrostatic copy, retire the original to a safe place in the file (such as its own separate folder), and use only copies for reference and other uses.

5.0 HOUSING MATERIALS: Folders, Sleeves, Envelopes, etc. Archival quality folders are better for permanent records than common commercial folders which are acidic. Archival quality folders should be used by Smithsonian units to file permanent records. Gummed envelopes contain acids and other chemicals that contribute to paper deterioration, and should not be used for storage of permanent records. Sleeves for storing paper, photographs, or other documents, should be of archival-quality material. See the Manual referred to in Section 1 above for further guidance.

6.0 ELECTROSTATIC COPYING • Copies from electrostatic copiers that meet specifications and standards contained in ANSI/ASTM 03458-75, "Copies from Office Copying Machines for Permanent Records" have the best chance of long-term survival. The same standard applies to computer printers. There are as yet no thoroughly tested national archival standard for electrostatic copying (commonly called "photocopying"). Some "industry standards" [shared understandings among manufacturers about minimum quality thresholds and how they are characterized in advertising] are beginning to emerge. Only dry-process copiers with carbon-based toners that firmly fix and bond the images or printing to archival paper through a strong heat process can produce durable copies with promise of meeting archival requirements of centuries-long survival. Any copier product may be tested simply by applying commercially-available "Magic" transparent (not cellophane) adhesive tape to the printing after the item has cooled, and peeling it off. If the printing lifts off easily with the tape, the document will be very short-lived.

The more resistant the printing is to the lift of the adhesive, the better the bond and the longer the durability of the document.

7.0 FACSIMILE (FAX) MACHINE. The paper in common FAX machines is not archival. If items from FAX machines are archival, as previously defined, they should be photocopied in accordance with the standards noted above, and the photocopies used for the permanent archival files.

8.0 MICROFILM. To meet archival standards, microfilm requires strict quality controls not commonly found in most mass-production commercial microfilming, and difficult if not impossible to enforce in contracts for commercial microfilming. Film stock, density (light/dark contrast), image resolution (sharpness), film processing, and film storage all must meet archival standards in order for the film imagery to be assured of long-term survival. If Smithsonian records are to be filmed as security for or in lieu of retention of paper, then the archival standards must be met for every step of the filming and storage process. Otherwise, retention and storage of the original paper records is in the long run less expensive. Relatively inexpensive diazo process microfilming will suffice for expendable reference copies, but they will not last more than a decade or two and will have to be replaced periodically.

9.0 COMPUTER RECORDS AND OTHER "MACHINE READABLE RECORDS". There is no guarantee that records in the "electronic environment" of computers will survive the generation of technology that presently holds them. Printing out such records on archival quality paper or faith in a future ability to transfer documents from one generation of storage/retrieval technology to another are the only two available choices, and the former one carries greater assurance of survival.

10.0 IMPLEMENTATION. As an aid to implementation of the policy to use archival quality paper in the production of documents which might be included in the permanent archives of the Institution, the following procedures are established:

10.1 Smithsonian Letterhead and Typing Paper. Paper in these categories will continue to be procured centrally by OPPM and supplied to bureaus and offices as needed. This paper will not be recycled material, and can be assumed to be of archival quality.

10.2 Photocopy Paper and Paper for Offset Printers. Paper in these categories will continue to be procured and supplied by OPPM who will assure that it is not recycled material. This includes paper used by the Duplicating Branch, OPPS, and that used by most of the Institution's personal computer and word

processor printers, and photocopiers (but not fax machines).

10.3 Paper used in Bulk Printing by Commercial Printers.

10.3.a Newsletters and Other Bulk Printing Not Otherwise Specified Herein - Bureaus and offices contracting for the printing of such documents have two options: to specify in the printing contract that recycled paper shall not be used; or to specify recycled paper. Under the latter option, the originating bureau or office shall prepare one record set (the original master set). This will be the archival copy, and must be printed on archival quality paper (not recycled paper). It will be maintained as such, either in the bureaus and offices permanent files or in the SI Archives. Bureaus and offices are responsible to assure this procedure is monitored and adhered to. (Also, see sec. 3.9 above.)

10.3.b Forms. Smithsonian Staff Handbook and Office Memoranda Commercially Printed - Much of the information regarding activities of the Institution which is of important archival interest is entered on forms. Standard government forms (the SF series, such as SF-171s, etc.) are obtained from GSA, and most are printed on non-recycled paper; these can be assumed to be of archival quality. (However, such quickly disposed-of forms as SF-63 Memorandum of Call, and SF-41 (Optional), Routing Slip, are not; they should not be included in archival files.) Forms unique to the Institution (the SI series) and printed by commercial vendors are centrally procured by MAO. That office shall specify that recycled paper shall not be used.

Smithsonian Staff Handbooks and Office Memoranda pose two problems. First, they are important to the permanent records of the Institution. Second, a supply of them is maintained by MAO to provide bureaus and offices with additional copies as needed over time. Thus, for both reasons they must be printed on non-recycled paper. When they are printed by commercial vendors, they are obtained by MAO, who is responsible to specify that recycled paper shall not be used.

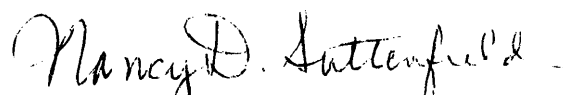
10.4 Bureau and Office Letterhead. Because many of the documents printed on such letterhead stationery will be of potential archival interest, it is necessary that bureaus and offices ordering their own letterhead from commercial printers specify that they shall be printed on non-recycled paper. As an alternative such stationery may be of recycled stock; if so it is the responsibility of the bureau or office to copy any document prepared on recycled letterhead onto non-recycled paper and maintain the copy as the record or master set.

10.5 computer Paper. Given the facts that many research and administrative documents of archival importance are computer-generated and that computer paper is not centrally supplied by OPPM, bureaus and office with mini- or mainframe computers are responsible to procure and use only non-recycled paper in their computers.

10.6 Research Notes and Journals. When it is intended that such notes and journals become permanent documentation of the research undertaken, they must be entered on non-recycled paper. It is the responsibility of the individual researcher to assure that this is done, guided by such criteria as his or her research department might establish to define when and to what extent such notes or journals will become permanent documentation of the research.

10.7 Guidelines for Procurement Offices. Offices procuring non-recycled paper used for documents in the above categories and for non-recycled paper products should specify:

- . that such paper and paper product not be recycled stock
- . and that such paper and product at least meet ANSI standards as summarized below:
 1. pH greater than 7.0 with alkaline reserve of 2% minimum in form of CaCO₃
 2. no residual processing materials
 3. no ink balls
 4. no ground wood pulp, new or recycled
 5. ability to meet specific printer use test, such as running through a photocopier, computer printer or offset press


Acting Under Secretary

INQUIRIES:	Smithsonian Archives
RETENTION:	Indefinite. This OM is subject to review for currency 18 months from the date hereof.
FILING INSTRUCTIONS:	File this office memorandum in numerical sequence with other current office memoranda
COPIES:	Additional copies of this OM may be obtained through the Operations Branch, Management Analysis Office.

SMITHSONIAN GENERAL RECORDS DISPOSITION SCHEDULES

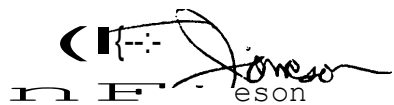
No. 910
Edition 1

Transmittal No.1
November 22, 1985

TO: Heads of organization units

Attached is a new Smithsonian Staff Handbook, "Smithsonian General Records Disposition Schedules" (SSH 910). This handbook contains schedules for the disposition of General Records for all offices of the Smithsonian Institution, and instructions on how to use them.

Please circulate one copy of this handbook to concerned members of your staff and file the second copy with your reference set of handbooks.


James H. Jones
Assistant Secretary for
Administration

INQUIRIES:	Smithsonian Archives
RETENTION:	Indefinite. This handbook is subject to review for currency 18 months from the date hereof.
COPIES:	Additional copies of this handbook may be obtained through the Operations Branch, Management Analysis Office.

FOREWORD

This handbook establishes a process for the disposition of broad categories of commonly-held routine records of the Smithsonian Institution through a series of schedules for disposal or retention. These schedules and other provisions of this handbook, issued by the Smithsonian Archivist, set standards for general records disposition as required by Office Memorandum 766 (rev.), Smithsonian Institution Archives - authority and responsibility, which assigns archival and records management authority and responsibility to the Smithsonian's Archivist.

FIRST EDITION
November 22, 1985

TABLE OF CONTENTS

CHAPTER 1 INTRODUCTION

1. Authority Purpose and Scope
2. Responsibility
3. Definitions
4. Smithsonian Archives, Activities and Assistance

CHAPTER 2 ; HOW TO USE THE-SMITHSONIAN GENERAL RECORDS DISPOSITION SCHEDULES,

1. Scheduled Dispositions
2. Request for Disposition Authority
3. Indefinite Retention

EXHIBIT A: Smithsonian Archives Records Disposition
Authority Form

CHAPTER 3 LIST OF SCHEDULES

- Schedule 1 Administrative Issuance Records
- Schedule 2, Personnel and Payroll Records
- Schedule 3 Procurement, Store, Supply, Contract
/ and Grant Records
- Schedule 4 Travel and Transportation Records
- Schedule 5 Audiovisual Records
- Schedule 6, Design and Construction Drawings and Related Records

SUBJECT INDEX

Chapter 1

INTRODUCTION

1. **AUTHORITY, PURPOSE, AND SCOPE.** General Records Disposition Schedules are issued by the Smithsonian Archivist under the authority of OM 766 (rev.) (Smithsonian Archives -- authority and responsibility), which assigns archival and records management authority and responsibility to the Smithsonian Archivist.

The schedules are issued to set disposition standards for Smithsonian Institution records that are common to several bureaus and units, including Institution-wide records common to many offices.

The General Records Disposition Schedules apply to all offices of the Smithsonian Institution.

2. **RESPONSIBILITY.** All documents created or received by employees in the course of official business are official records of the Smithsonian Institution. None may be discarded, destroyed, donated, or otherwise disposed of except in accordance with the provisions of OM 766 (rev.) and records schedules promulgated by the Smithsonian Archivist. (Documents accessioned into the collections are not considered records for purposes of this handbook. Once accessioned, such documents are governed by the collections management /policy of the appropriate collecting organization.)

Directors of offices that produce records are particularly responsible for a full and accurate record of activities and for compliance with records disposition schedules.

3. DEFINITIONS

a. Records Disposition: Records that become inactive and have no further current use to an operating office that created or received them should be:

retained by the office indefinitely because they have permanent legal, administrative, or historical value;

transferred to the Archives because of their lasting value;

retained by the office for a specific term of years according to statutory or administrative requirements;

transferred to the records center for further appraisal of their value; or,

discarded or destroyed because they have insufficient value to warrant further retention.

b. Records Disposition Schedule: A timetable of actions authorized to be taken in the disposition of records no longer needed for current operations. There are two types of records disposition schedules: general and specific.

c. General Records Disposition Schedule: A general schedule identifies routine, Smithsonian-wide records or records common to several units, such as directives, personnel records, budget records, travel records, accounting records, and the like, and provides instructions and procedures for their periodic disposition.

d. Specific Records Disposition Schedule: A specific schedule identifies particular records created or received by an individual office, and provides instructions and procedures for their periodic disposition. When the provisions of a specific schedule conflict with those of a general schedule, the specific schedule should prevail unless excepted by the Smithsonian Archivist.

e. Office of Record: An office of the Smithsonian Institution assigned special and specific responsibility under a records disposition schedule for the maintenance of the master record set of a particular type or class of records. Procedures for the disposition of master record sets are given in specific records disposition schedules for individual offices of record.

f. Records Center: A place for the temporary storage of non-current records awaiting disposition. The center is maintained by the Smithsonian Archives to help relieve operating offices from the burden of storing inactive files no longer needed for current operations but awaiting appraisal and disposition authority.

4. SMITHSONIAN ARCHIVES ACTIVITIES AND ASSISTANCE. The Smithsonian Archives undertakes the following activities:

assists offices to establish filing systems to improve the efficiency in identifying and preserving official records;

conducts records surveys in individual offices to identify and appraise existing records and records keeping systems;

in consultation with office directors establishes records disposition schedules for the orderly transfer and disposal of records; and,

transfers inactive records to the records center or to the Archives.

Assistance in records keeping, records disposition, and other questions or problems concerning the handling of specific records may be obtained by consulting the Archives. One purpose of the Smithsonian Archives is to help operating offices do a better job of keeping the official record and preserving it for future reference. Another purpose is to help assure office directors that they have ready access to such records as may be required for current operations.

CHAPTER 2

HOW TO USE THE SMITHSONIAN GENERAL RECORDS DISPOSITION SCHEDULES

This handbook recommends disposition actions for broad categories of commonly-held, routine records. Each general schedule is listed in the Table of Contents, and may be found in Chapter 3 of this handbook.

Each general schedule opens with an introduction to the category of records it covers, describing the records, giving the scope of application of the schedule, specifying exceptions to the schedule, identifying office(s) of record, and giving additional explanations, as appropriate. Below the introduction, specific records covered by the schedule are listed to the left. Their corresponding disposition recommendations are listed to the right.

A subject index, which is located at the end of this handbook, will help you find specific records, in alphabetic order by subject, and locate the general schedule in which each subject appears.

Disposition recommendations found in the schedules fall into three broad classes of actions, each requiring a different procedure as described below.

1. Scheduled Disposal. The indicated records may be destroyed or discarded after the passage of a certain period of time or after certain events have taken place as noted in the recommendation.

Offices other than the office of record need no further authority than the general records disposition schedule to destroy or discard the specified records after the time period has elapsed or after the events have taken place; but,

After disposal action has taken place, the office taking the action must report it to the Smithsonian Archivist, using the form "Records Disposition Authority," (SI-3683). Refer to Exhibit A for a copy of the form. Additional copies may be obtained through the Office of Supply Services. (OSS Supply Stock Item # 754-322)

Two copies of the form must be submitted. Be certain that all data are clearly and precisely entered and that the records are completely and accurately described.

Be certain to cite the general disposition schedule that authorizes the action taken by entering it in the column marked: "Records were discarded according to:"

2. Request for Disposition Authority. The indicated records must not be disposed of without specific authority from the Smithsonian Archivist.

An office wishing to dispose of such records must submit two copies of the "Records Disposition Authority" form to the Smithsonian Archivist, making sure that the correct general records disposition schedule and item are properly cited in the column marked "Disposition authority requested for:"

The Archivist will review the request and decide on the appropriate action, after consultation with the office director concerned.

If the Archivist does NOT authorize disposal, he will schedule an on-site survey of the records in question, to reappraise their value with the advice and cooperation of the office staff, and to make a joint decision on the disposition of the records.

If the Archivist DOES approve disposal of the records in question, he will return one copy of the form to the office, indicating that disposal may proceed. When disposal is completed, an amended copy of the form should be returned to the Archivist, indicating that the authorized disposal has taken place.

3. Indefinite Retention. The indicated records must be retained indefinitely, either by the office concerned or by the Archives.

Such records are appraised by the Archivist as having permanent value, prima facie, and the operating office must retain them, or (if inactive and not needed) transfer them to the Archives.

The records are subject to future reappraisal and to the development of specific records disposition scheduling, either of which may be conducted by the Archives upon request by the office in question.

Any appeal of the provisions and recommendations in the general records disposition schedules must be submitted in writing to the Smithsonian Archivist for review of the facts and arguments of the appeal. Facts and arguments should be clear and precise in order to assure prompt action, and the action requested must be shown to be in the best interests of the Institutional record.

Exhibit A

-SI-3683

4-3683 6-4-85

SSH 910 Tr. 1
1st ed.
11/22/85

CHAPTER 3

LIST OF SCHEDULES

This chapter contains the General Records Disposition Schedules which apply to all offices of the Smithsonian Institution.

These schedules should be referred to when the disposition of general Smithsonian records becomes necessary.

SCHEDULE 1

Administrative Issuance Records

Official statements of Smithsonian policy, announcements of ephemeral events, and administrative forms are covered in this schedule. The instructions below pertain only to an issuance and not to any files or other supporting documentation created during implementation of policy statements and other official administrative issuances. This schedule does not involve statements of policy or related issuances produced for internal purposes of a bureau, office, or department.

The Management Analysis Office is the office of record for Smithsonian administrative issuances.

DESCRIPTION OF RECORDS	AUTHORIZED DISPOSITION
1. <u>Office Memoranda</u>	Destroy when superseded or canceled.
2. <u>Staff Handbooks</u>	Destroy when superseded or canceled.
3. Announcements	Destroy when an administrative need for the information no longer exists.
4. Smithsonian Forms (blank)	Destroy when obsolete, or no longer needed.

SCHEDULE 2

Personnel and Payroll Records

This schedule applies only to copies of personnel and payroll records kept by bureaus and offices for internal purposes. It does not apply to the Office of Personnel Administration, the Office of Accounting and Financial Services, or personnel offices of the Smithsonian Astrophysical Observatory and the Smithsonian Tropical Research Institute, which serve as the Institution's offices of record for personnel and payroll files. These offices maintain such records until all legal and administrative obligations are met, with separate disposition schedules established for these offices.

Copies of personnel and payroll records held for informational purposes by bureaus and offices are to be disposed of as shown below. For any records of this type not listed below, such material must be appraised by the Smithsonian Archives before any disposition of these records can be made.

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

1. Personnel Records

Most personnel and payroll actions are kept in personnel files arranged alphabetically by staff name, which are treated in 1a. below. Where specific information is kept separate from the personnel files see 1c.-1f. and 2a.-2c., below.

- | | |
|-------------------------------------|---|
| a. Personnel file. | Submit request to Smithsonian Archives for Records Disposition Authority. |
| b. Application for employment files | Destroy when 1 year old. |
| c. Employee record cards. | Destroy after transfer or separation of employee. |
| d. Incentive award files. | Destroy 2 years after approval or disapproval of the award. |
| e. Job descriptions. | Submit request to Smithsonian Archives for Records Disposition Authority. |
| f. Training forms. | Destroy when 3 years old. |

SCHEDULE 2 (Cont'd)

DESCRIPTION OF RECORDS	AUTHORIZED DISPOSITION
2. <u>Payroll Records</u>	
a. Application for leave.	Destroy 6 months after the end of the pay period.
b. Notification of basic change.	Destroy when 2 years old, or when superseded.
c. Request to have paycheck mailed to a specific address.	Destroy when superseded, or after transfer or separation of employee.
d. Time and attendance reports.	Destroy 6 months after the end of the pay period.
3. <u>Smithsonian Careers</u> {job announcements}	Destroy when 3 months old, or when an administrative need for the information no longer exists.

SCHEDULE 3

Procurement, Stores, Supply, Contract, and Grant Records

Most fiscal and supply records maintained by bureaus, departments, and offices throughout the Smithsonian Institution are routine and may be discarded periodically with no reservation. Nonetheless, there are records which document non-routine activities, and are important for either historical or administrative purposes.

The Office of Accounting and Financial Services, the Contracts Office, the Office of Fellowships and Grants, the Office of Supply Services, and the Contracts and Procurements Office at the Smithsonian Astrophysical Observatory are considered the offices of record for fiscal, supply, and grant records within the Institution. These offices maintain copies of such records until all Smithsonian legal and administrative obligations have been met. Separate disposition schedules have been established for these offices.

Any records maintained by Smithsonian bureaus, departments, and offices not scheduled below must be appraised and individually scheduled by the Smithsonian Archives before any disposition of the records may be made.

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

1. Requisitions and Contracts
for Non-personal Services

- | | |
|---|---|
| a. Transactions of more than \$25,000. | Submit request to Smithsonian Archives for Records Disposition Authority. |
| b. Transactions pertaining to the purchase, repair, or restoration of museum specimens or artifacts. | One record copy of each transaction to be maintained indefinitely by the museum registrar, or other museum office given the responsibility for maintaining documentation on that museum collection. |
| c. Transactions pertaining to building construction, renovation of buildings, construction of exhibits. | Submit request to Smithsonian Archive for Records Disposition Authority. |
| d. All other transactions including stock requisitions and book purchases. | Destroy 3 years after final payment. |

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

2. Requisitions and Contracts
for Personal Services

Transactions for the
contracting of personal
services including
contracts and grants
for research or
consultation.

Submit request to Smithsonian
Archives for Records Disposition
Authority.

SCHEDULE 4

Travel and Transportation Records

Most records pertaining to travel and transportation are usually kept as part of larger files documenting other activities, such as exhibitions, museum collections, and personnel action. When this occurs, travel and transportation records must be appraised as part of the larger file, and are not covered by this schedule. Only when travel and transportation records are filed separately, are they to be treated according to the schedule below.

The Travel Services Office, the Office of Accounting and Financial Services, and museum registrars and shipping offices are responsible for the shipment of freight, household goods, museum objects, and personal travel, and the payment thereof, and are offices of record for travel and transportation records.

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

1. Freight Records

)

a. Commercial or government bills of lading, and records relating to the shipment of household goods.

Destroy when 3 years old.

b. International shipment of household goods, and ocean freight shipment records.

Destroy when 6 years old.

c. United States Customs records.

Destroy when 6 years old.

2. Passenger Transportation Files

Authorization for travel, itineraries, and government transportation requests.

Destroy when 3 years old.

3. Passenger Reimbursement Files

Records relating to the reimbursement of individuals for travel.

Destroy when 3 years old.

SCHEDULE 4 (Cont'd)

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

4. Travel Reports

Reports for the record or to agency officials, bureau, department, and office heads, detailing travel accounts, meetings attended, conferences, summation of persons and places visited.

Submit request to the Smithsonian Archives for Records Disposition Authority.

5. Invoices and Vouchers Documenting Transfer of Museum Specimens and Artifacts

a. Shipment of loans from Smithsonian museum permanent collections.

1. Record copy.

To be maintained indefinitely by the museum registrar, or other museum office given the responsibility for maintaining documentation on that museum collection.

2. All other copies.

Submit request to Smithsonian Archives for Records Disposition Authority.

b. Shipment of museum objects on loan to the Smithsonian.

1. Record copy.

To be maintained indefinitely by the museum registrar, or other museum office given the responsibility for maintaining documentation on that museum collection.

2. All other copies.

Submit request to Smithsonian Archives for Records Disposition Authority.

SCHEDULE 5

Audiovisual Records

The Office of Special Events and the Office of Telecommunications routinely transfer audio records to the Smithsonian Archives for permanent retention. However, other bureaus, departments, and various offices throughout the Smithsonian produce audiovisual records as part of their daily activity. Because of this, there is no office of record for audiovisual materials.

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

1. Still Pictures Files

- | | |
|---|---|
| a. Photographic requests from outside the Institution, and photographic requests from Smithsonian staff. | Destroy 1 year after completion of the request. |
| b. Signed permission statements authorizing publication of a reproduction taken from the Smithsonian collections. | To be maintained indefinitely by the museum registrar, or other museum office given the responsibility for maintaining documentation on the museum collection; or submit request to Smithsonian Archives for Records Disposition Authority. |
| c. Black and white photography, color photography, print and negative (print and negative should be captioned), documenting Smithsonian collections. | See 1b., above. Negatives should be sent to the Office of Printing and Photographic Services, or museum photographic lab for permanent retention. |
| d. Photography documenting exhibit openings, and photography documenting Smithsonian events, including meetings, conferences, festivals, and speeches (print and negative should be captioned). | Submit request to Smithsonian Archives for Records Disposition Authority. |

SCHEDULE 5 (Cont'd)

DESCRIPTION OF RECORDS	AUTHORIZED DISPOSITION
e. All other photography and installation shots.	See 1d., above.
f. Slide sets and transparencies.	See 1d., above.
g. Slide sets and photographs used as Smithsonian training material.	See 1d., above.
2. <u>Sound Recordings</u>	
Includes disc recordings, magnetic reel-to-reel recordings, cassettes, and cartridges.	
a. Smithsonian radio programs and radio public service announcements.	Submit request to Smithsonian Archives for Records Disposition Authority.
b. Recordings of Smithsonian events, meetings, speeches, conferences, and festivals.	See 2a., above.
c. Oral history collections.	See 2a., above.
d. Dictation belts and tapes.	Destroy after transcription has been proofed, verified, and approved.
e. Recordings of Smithsonian musical events.	See 2a., above.
f. Recordings for or about Smithsonian museum exhibits.	See 2a., above.
3. <u>Motion Picture Files</u>	
a. Training films created by the Smithsonian.	Submit request to Smithsonian Archives for Records Disposition Authority.
b. All other training film.	See 3a., above.

SCHEDULE 5 {Cont'd}

DESCRIPTION OF RECORDS	AUTHORIZED DISPOSITION
c. Smithsonian television films and television public service announcements.	See 3a., above.
d. Smithsonian movie film.	See 3a., above.
e. Smithsonian videotape.	See 3a., above.
f. Recordings of Smithsonian events, meetings, speeches, conferences, and festivals.	See 3a., above.
g. Recordings for or about Smithsonian museum exhibits.	See 3a., above.
4. Posters	
a. Created for Smithsonian sponsored events and exhibits.	Submit request to Smithsonian Archives for permanent retention.
b. Created by other institutions and used as an information file.	Submit request to Smithsonian Archives for Records Disposition Authority.
5. Handbills and Flyers	
a. Created for Smithsonian sponsored events, exhibits, public service information.	Submit request to Smithsonian Archives for Records Disposition Authority.
b. Created by other institutions and used as an information file.	Submit request to Smithsonian Archives for Records Disposition Authority.

SCHEDULE 6

Design and Construction Drawings and Related Records

The Office of Design and Construction, the Office of Plant Services, the Office of Facilities Services, and the Office of Construction Management of the National Zoological Park, are the offices of record for design and construction drawings and related records at the Smithsonian.

Drawings for the design and construction of buildings include preliminary drawings, intermediate and pre-final drawings, final working drawings, "as built" drawings, shop drawings, repair and alteration drawings, models, and space assignment plans. Original sketches documenting Smithsonian exhibits, and architectural drawings documenting buildings which are or become part of the Smithsonian, and are in the possession of bureaus, are archival, and must be offered to the Smithsonian Archives for permanent retention.

DESCRIPTION OF RECORDS

AUTHORIZED DISPOSITION

1. Drawings, Sketches, and Designs

Linen and mylar drawings, or the only available copy, documenting the design, construction, and renovation of Smithsonian buildings; original sketches and designs documenting the creation and layout of an exhibit; contracts, specifications, and change orders associated with building construction and renovation.

Submit request to Smithsonian Archives for Records Disposition Authority.

2. Models

Submit request to Smithsonian Archives for Records Disposition Authority.

3. Space Assignment Plans

Submit request to Smithsonian Archives for Records Disposition Authority.

4. OPLANTS Requisitions

a. For construction of an exhibit.

Submit request to Smithsonian Archives for Records Disposition Authority.

b. All other requisitions.

Destroy 6 months after work is completed or requisition canceled.

SUBJECT INDEX

	Schedule	Item
Administrative Management		
Announcements	1	3
Forms	1	4
Office memorandum	1	1
Staff handbooks	1	2
Announcements	1	3
Application for Leave	2	2
Applicant Files	2	1
Artifacts and Specimen Collections		
Audiovisual materials	5	1
Exhibit drawings	6	1
Invoices	4	5
Purchase orders	3	1
Repair and restoration	3	1
Audiovisual		
Authorization for reproduction	5	1
Exhibits	5	1-5
Events	5	1-5
Flyers	5	5
Handbills	5	5
Motion picture films	5	3
Movie film	5	3
Posters	5	4
Request for materials	5	1
Sound recordings	5	2
Still pictures and color slides	5	1
Television film	5	3
Training material	5	1,3
Videotape	5	3
Authorization for Travel	4	2
Awards (incentive)	2	1
Bills of Lading	4	1
Book Purchases	3	1

Schedule

Buildings

Construction costs	3	1
Design and construction drawings	6	1, 3
Renovation costs	3	1

Conferences

Recordings of	5	1-5
Travel reports	4	4

Construction Records

3	1
6	1-4

Contracts

3	1, 2
---	------

Customs Records

4	1
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Design and Construction Records

Buildings	6	1-4
Exhibits	6	1, 4
Models	6	2
OPLANTS requisitions	3	1
	6	4
Space assignment plans	6	3

Dictation Belts and Tapes

5	2
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Drawings (Design and Construction)

"As Built"	6	1
Final	6	1
Intermediate	6	1
Prefinal	6	1
Preliminary	6	1
Repair and alteration	6	1
Space assignment plans	6	3
Shop	6	1

Employee Record Card

2	1
---	---

Events

Conferences	5	1-5
Exhibits	5	1-5
Festivals	5	1-5
Meetings	5	1-3
Musicals	5	1-5

Schedule

Events {continued)

Radio programs and announcements	5	2
Speeches	5	1-5

Exhibits

Construction	3	1
Drawings	6	1
Flyers	5	5
Handbills	5	5
Motion picture film	5	3
Posters	5	4
Sound recordings	5	2
Still pictures	5	1

Festivals	5	1-5
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Flyers	5	5
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Forms

Blank {official)	1	4
Training	2	1

Freight Transportation	4	1
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Grants	3	1,2
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Government Bills of Lading	4	1
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Handbills	5	5
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Handbooks, Staff	1	2
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Household Goods

Domestic shipment	4	1
International shipment	4	1

Incentive Awards	2	1
	3	1,2

Invoices	3	1,2
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International Shipment of Household Goods	4	1
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	<u>Schedule</u>	Item
Job Announcements	2	3
Job Descriptions	2	1
Manuals, Staff	1	2
Meetings		
Recordings of	5	1-3
Travel reports	4	4
Models (construction)	6	2
Movie Film	5	3
Musical Events	5	1-5
Office Memorandum	1	1
OPLANTS Requisitions	3	1
	6	4
Oral History Collections	5	2
Passenger Transportation Records	4	2,3
Personnel and Payroll Records		
Applicant files	2	1
Application for leave	2	2
Employee record card	2	1
Incentive award files	2	1
Job descriptions	2	1
Notification of basic pay change	2	2
Personnel file	2	1
Request to have paycheck mailed	2	2
to specific address		
Smithsonian Careers	2	3
(job announcements)		
Time and attendance reports	2	2
Training forms	2	1
Training material	5	1,3
Photographs		
Black and white prints	5	1
Color prints	5	1
Exhibits	5	1
Negatives	5	1
Permission to reproduce	5	1
photograph of Smithsonian		
permanent collection		
Requests for copies	5	1
Training material	5	1

	Schedule	Item
Posters	5	4
Procurement	3	1,2
Public Service Announcement	5	2,3
Purchase Orders	3	1,2
Radio Programs	5	2
Repair and Alteration Drawings	6	1
Requisitions	3	1,2
Shop Drawings	6	1
Slides	5	1
Sound Recordings		
) Conferences	5	2
, Dictation belts and tapes	5	2
Events	5	2
Exhibits	5	2
Festivals	5	2
Musical events	5	2
Oral history collections	5	2
Radio programs	5	2
Speeches	5	2
<u>Smithsonian Careers</u>		
(job announcements)	2	3
Space Assignment Plans	6	3
Specimen Collections and Artifacts		
Invoices	4	5
Permission to reproduce	5	1
photographs	3	1
Purchase orders	3	1
Repair and restoration	3	1
Speeches (recordings of)	5	1-5
Staff Handbooks	1	2

	Schedule	Item
Stock Requisitions	3	1
Stores	3	1
Supplies	3	1
Television Film-	5	3
Time and Attendance Reports	2	2
Training		
Film	5	3
Forms	2	1
Photographs	5	1
Slides	5	1
Tranparencies	5	1
Travel and Transportation		
Authorization	4	2
Freight records	4	1
Passenger transportation files	4	2
Passenger reimbursement	4	3
Travel reports	4	4
Specimen collections and artifacts, invoices	4	5
Travel Authorization	4	2
Travel Reports	4	4
Videotape	5	3
Vouchers	4	5
Personal	4	2
Specimen collections and artifacts	4	5



COLLECTIONS MANAGEMENT

A. Purpose	1
B. Background	2
C. Applicability	3
D. Authority and Responsibility	3
E. Ethics	6
F. Accounting for Collections	6
G. Exceptions	6
H. Unit Policy Requirements	7
1. Introductory Statements	7
2. Acquisition and Accessioning	8
3. Deaccessioning and Disposal	11
4. Preservation	14
5. Collections Information	16
6. Inventory	19
7. Risk Management and Security	20
8. Access	23
9. Loans	24
10. Intellectual Property Rights	26
11. Specific Legal and Ethical Issues	29
Appendix: Board of Regents Policy	37

A. Purpose

This directive implements and establishes policies according to the *Smithsonian Institution Collections Management Guidelines*, approved by the Board of Regents and issued by the Secretary in May 1999 (Appendix A). Collections management is the deliberate development, maintenance, preservation, documentation, use, and disposition of collections. Collections include objects, natural specimens, artifacts, and other items that are acquired, preserved, and maintained for public exhibition, education, and study.

A. Purpose
(Continued)

The [Smithsonian Directive \(SD\) 600 Implementation Manual](#) provides technical guidance, advice, and information to assist collecting units in achieving the standards and implementing the policies set forth in this directive.

B. Background

The collecting units of the Smithsonian develop, maintain, preserve, research, interpret, and, in the case of living plants and animals, propagate, collections of art, artifacts, and natural specimens. The acquisition, preservation, management, and study of collections are fundamental to the Smithsonian's mission and have been the foundation upon which its reputation rests. Assembled over more than 150 years, the national collections are central to many of the core activities and to the vitality and significance of the Smithsonian. Collections serve as an intellectual base for scholarship, discovery, exhibition, and education. Collections also provide content for Smithsonian ventures such as publishing, licensing, and media projects.

Each Smithsonian collecting unit maintains its own unique collection, purpose, character, and role in achieving the Smithsonian's mission of "the increase and diffusion of knowledge." Among the vast collections are irreplaceable icons of the nation, examples of common life, and scientific material vital to the study of the world's natural and cultural heritage. Smithsonian collections represent a diverse range of materials and disciplines, including works of art, historical artifacts, natural and physical science specimens, living animals and plants, images, archives, libraries, audio and visual media, and their associated information. Together, they preserve the past, increase our understanding of society and the natural world in which we live, and support the research that expands human knowledge in the arts, humanities, and sciences. The scope, depth, and unparalleled quality of these collections make it

B. Background
(Continued)

imperative to ensure that they are properly preserved and made accessible for current and future generations to behold, enjoy, and study.

C. Applicability

This directive applies to all collecting units—Smithsonian units that have delegated collecting authority to acquire and manage collections. Only designated collecting units, as listed in the [SD 600 Implementation Manual](#), have the authority to acquire and manage collections.

D. Authority and Responsibility

The acquisition and possession of collections impose legal and ethical obligations to provide proper management, preservation, and use of the collections and their associated information.

Collections management responsibilities are delegated as follows:

1. **The Board of Regents**, acting through the Secretary, the Under Secretaries, the Director - International Art Museums Division, and each collecting unit director, is responsible for assuring that
 - a. the scope of each collection supports the Smithsonian and collecting unit mission
 - b. collections growth is balanced with available resources
 - c. personnel, facilities, equipment, and support are reasonably allocated to meet the ongoing needs of the collections
 - d. prudent collections management policies are established, implemented, and monitored
2. The Board of Regents retains ultimate oversight authority and fiduciary responsibility for Smithsonian collections, which are dedicated to furthering the Smithsonian's mission for the "increase and diffusion of knowledge." The Board of Regents delegates to the Secretary operational oversight authority for the collections.

D. Authority and Responsibility
(Continued)

3. ***The Secretary*** is responsible for establishing and overseeing appropriate policies and programs and ensuring compliance with applicable laws and regulations. The Secretary may delegate to the Under Secretaries, the Director - International Art Museums Division, collecting unit directors, and other appropriate staff the responsibility to implement established policies and carry out the direct management and care of Smithsonian collections.
4. ***The Under Secretaries and the Director - International Art Museums Division*** ensure that Smithsonian collections are managed in compliance with this directive through oversight of collecting unit directors.
5. ***The collecting unit director*** is responsible for
 - a. unit policy guidance, program direction and planning, and budget support to carry out the collections management requirements established in this directive
 - b. establishing collecting priorities to guide the development of collections
 - c. establishment, review, and revision of unit collections management policies
 - d. unit compliance with this directive, [*SD 600 Implementation Manual*](#), and unit collections management policy, including an annual report on compliance
 - e. delegating authority and assigning collections responsibility to the appropriate unit staff
6. A collecting unit may have an advisory board or commission, created by the Board of Regents or pursuant to federal statutes, to provide advice and assistance to the Board of Regents, Secretary, and collecting unit directors. The role of advisory boards or commissions with respect to collections shall be specified in bylaws approved by the Board of Regents. By statute or legal agreement, the Boards

D. Authority and Responsibility
(Continued)

of the Archives of American Art, Hirshhorn Museum and Sculpture Garden, and National Museum of the American Indian have been given sole authority for specified collections management decisions. This authority shall be carried out in accordance with the general policies of the Board of Regents and applicable directives established by the Secretary, including this directive.

7. **Collecting unit staff members** are responsible for carrying out their delegated collections management responsibilities to ensure
 - a. implementation of established collections management policies and procedures
 - b. adherence to applicable professional practices
 - c. proper management, preservation, and use of collections
 - d. the integrity and accuracy of collections information
 8. **The National Collections Coordinator, National Collections Program, Smithsonian Institution Archives**, is responsible for
 - a. monitoring the implementation of this directive
 - b. ensuring the development and application of the [*SD 600 Implementation Manual*](#)
 - c. advising the Under Secretaries and Director - International Art Museums Division on the effectiveness and implementation of this directive
 - d. recommending revisions to this directive, as appropriate
 9. **Other central offices**, such as the Office of General Counsel, Office of Protection Services, and the Office of the Treasurer's Division of Risk Management, provide a collections management service function to Smithsonian collecting units as specified in this directive and the [*SD 600 Implementation Manual*](#).
-

E. Ethics

The Smithsonian recognizes and accepts its fiduciary responsibility to provide proper management, preservation, and use of the collections and associated information it holds for the benefit of the public.

Smithsonian staff have legal, ethical, and professional obligations to maintain high levels of honesty, integrity, and loyalty to the Institution. These standards of conduct are set forth in SD 103, *Standards of Conduct*. SD 103 establishes Smithsonian policy regarding ethical standards to which all Smithsonian employees are required to adhere. Each collecting unit must have established procedures for implementing the requirements of SD 103 as well as other standards of professional conduct set forth in the [SD 600 Implementation Manual](#).

F. Accounting for Collections

Smithsonian collections are held for public exhibition, education, and research in furtherance of public service rather than financial gain. Collections are protected, kept unencumbered, cared for, and preserved, and they are subject to the requirement that proceeds from sales of collections are to be used to acquire other collection items. Accordingly, the Smithsonian does not treat its collections as assets for purposes of reporting in its financial statements. The Smithsonian adheres to the applicable financial reporting standards governing collections held in public trust as set forth in the [SD 600 Implementation Manual](#). The National Collections Coordinator is responsible for submitting to the Office of the Comptroller the information required for disclosure on the Smithsonian's financial statement.

G. Exceptions

Prudent exceptions to Smithsonian collections management policy may be permitted in appropriate cases when in the best interests of the Smithsonian. Exceptions to this directive must be approved according to the process set forth here and in the [SD 600 Implementation Manual](#). The Secretary will report

G. Exceptions
(Continued)

annually to the Board of Regents on all exceptions to these policies that have been authorized during the reporting period.

**H. Unit Collections
Management Policy
Requirements**

Smithsonian collections management is guided by the following principles:

- a. Each collecting unit develops, implements, and adheres to an authorized, written collections management policy to ensure the proper physical care and preservation of its collections; provide for the documentation of their identification, location, condition, and provenance; and ensure maximum accessibility consistent with their preservation, security, and legal considerations.
- b. Collecting unit policies adhere to the policies set forth in this directive and guidelines established in the [SD 600 Implementation Manual](#) and are consistent with Smithsonian and unit missions and goals.
- c. Collecting unit policies are periodically reviewed and, if necessary, revised and reauthorized.
- d. All Smithsonian collections have access and accountability policies for their use and management.

Each Smithsonian collecting unit designs policies specific to the nature, scope, and character of its collections. Collecting unit policies must have the approval of the National Collections Program, Office of General Counsel, appropriate Under Secretary or Director - International Art Museums Division, and the Secretary. Each collecting unit policy must include the following components and provisions.

**1. Introductory
Statements**

- a. **Statement of purpose.** A statement of purpose clearly defines the collecting unit's mission, goals, and objectives with regard to collections. The collecting unit's statement of purpose adheres to all Smithsonian policies, including this directive, as well as empowering laws and statutes.

**1. Introductory
Statements**
(Continued)

- b. **Primary statement of authority.** The statement describes the operational authority of the collecting unit, stipulating the role and responsibilities of boards, committees, advisory commissions, director, and staff regarding the delegation of authority for collection activities. Collecting units must clearly establish lines of authority and responsibility for all collection activities and emphasize the maintenance of complete, written records regarding all collections-related decisions and activities.
- c. **Definition of collections.** Smithsonian holdings include museum, archive, and library collections. Collections may be categorized by legal and curatorial status and the intended use of the collections. Collections include items (referred to here as “collection items”) acquired for accessioned, non-accessioned, supplementary, study, or research collections, provided the items are acquired, preserved, and maintained for public exhibition, education, or research.
- d. **Collecting scope statement.** Collecting units must establish a collecting scope statement that defines its collecting parameters, goals, and objectives in relation to its mission and existing collections. Collecting scope statements ensure logical, responsible collections growth by establishing well-defined goals and priorities that guide collecting activities.

**2. Acquisition and
Accessioning**

Acquisition is the act of gaining legal title to a collection item or group of items.

Accessioning is the formal process used to acquire legally and to record a collection item or group of items into a Smithsonian collection.

2. Acquisition and Accessioning (Continued)

- a. **Principles.** The acquisition of collections is fundamental and critical to the vitality of the Smithsonian. The Smithsonian acquires collection items by a variety of methods, including gift, bequest, purchase, exchange, transfer, and field collecting. In addition, some Smithsonian collecting units may also acquire collections by propagation. The Smithsonian requires responsible, disciplined acquisition of collections through the following principles:
 - (1) the acquisition of collections relevant to the mission and goals of the Smithsonian and individual collecting unit
 - (2) the establishment and periodic review of collecting scope statements which define collecting goals and priorities
 - (3) clear delegation of collecting authority within collecting units
 - (4) the use of formalized acquisition evaluation criteria
 - (5) strict adherence to professional ethics and all applicable laws and regulations relating to collections acquisition
- b. **Policy**
 - (1) Collections may be acquired only in accordance with established authority and only when consistent with applicable law and professional ethics. All applicable federal, state, local, and international laws, treaties, regulations, and conventions will be observed and compliance documented.

**2. Acquisition and
Accessioning**
(Continued)

- (2) The Smithsonian observes the highest legal and ethical standards in the acquisition of collections. Collecting units shall exercise due diligence in the acquisition of collections, including making reasonable inquiries into the provenance of collection items under consideration for acquisition, to determine that the Smithsonian can acquire a valid title to the collection item and the acquisition will conform to all legal and ethical standards as set forth in the [SD 600 Implementation Manual](#).
- (3) As a general rule, collection items are acquired and accessioned only when there is a good faith intention to retain them in the Smithsonian collections for an indefinite period of time. Exceptions to this rule may be approved in accordance with guidelines established in the [SD 600 Implementation Manual](#).
- (4) As a general rule, the Smithsonian only acquires unrestricted collections. Exceptions to this rule may be approved in accordance with guidelines established in the [SD 600 Implementation Manual](#).
- (5) Consultation with the appropriate Under Secretary or Director - International Art Museums Division is required before acquisition of any collection that would require substantial resources beyond the collecting unit's allocated budget or substantial resources of other Smithsonian units for the management or preservation of the collection.

2. **Acquisition and Accessioning** (Continued)

- (6) Among the various Smithsonian collecting units, some overlap in collecting is inevitable; however, competition for a particular acquisition is inappropriate. When more than one collecting unit seeks to acquire the same collection item, the directors concerned must agree on which unit will acquire the collection item. In those rare cases when the placement of a collection item cannot be resolved by the directors, the appropriate Under Secretaries and/or Director - International Art Museums Division will decide.
 - (7) The Smithsonian will avoid competitive bidding with federal organizations for collection items of common interest and will seek mutually acceptable agreements whenever the potential for competitive bidding with such organizations becomes apparent.
 - c. **Implementation.** Each collecting unit must
 - (1) establish authority and assign responsibility to approve, document, and process acquisitions and accessioning
 - (2) incorporate applicable guidelines for acquisitions and accessioning set forth in the [SD 600 Implementation Manual](#)
 - (3) establish evaluation criteria for acquisitions
 - (4) establish appropriate methods of acquisition
 - (5) ensure documentation of legal title and provenance of collection items acquired
-

3. **Deaccessioning and Disposal**

Deaccessioning is the process used to formally approve and record the removal of a collection item or group of items from the collecting unit's accessioned collections.

Disposal is the act of physically removing a collection item or group of items from a Smithsonian collection.

3. Deaccession and Disposal
(Continued)

- a. **Principles.** As a general rule, collections are acquired for Smithsonian collections only when there is a good faith intention to retain the material for an indefinite time period. Collections are retained as long as they continue to serve the goals and objectives of the Smithsonian and can be properly maintained and used.

Deaccessioning and disposal are a legitimate part of responsible collections management. Prudent collections management includes judicious consideration of appropriate deaccessioning and disposal. The periodic review, evaluation, deaccessioning, and disposal of existing collections is intended to refine and improve the quality and relevance of the collections with respect to the Smithsonian's mission and purpose. Deaccession and disposal procedures are designed to insure thoughtful, well-documented consideration of each proposed collection item in the context of the long-term interest of the Smithsonian, the general public, and the collection item.

Deaccessioning and disposal occur for a variety of reasons, such as deterioration of collection items beyond usefulness; duplication or redundancy of collection material; insufficient relationship of collection items to the mission and goals of the collecting unit such that they are judged to be better placed elsewhere; repatriation; and selection for consumptive research or educational use.

The Smithsonian disposes of collections by a variety of methods, such as donation, transfer, exchange, sale, repatriation, and destruction. In addition, some Smithsonian collecting units may also record disposal of collections by death.

3. Deaccession and Disposal

(Continued)

b. Policy

- (1) Collections may be deaccessioned and disposed of only in accordance with established authority and only when consistent with applicable law and professional ethics. All applicable federal, state, local, and international laws, treaties, and regulations and any other applicable restrictions will be observed and documented.
- (2) If the estimated value of a single collection item or a group of collection items considered for disposal is
 - (a) more than \$10,000, the collecting unit must obtain a written, independent appraisal or informed estimate of fair market value
 - (b) more than \$100,000, the collecting unit must obtain two written, independent appraisals or informed estimates of fair market value and approval of the deaccession and disposal from the Office of the General Counsel, the appropriate Under Secretary or Director - International Art Museums Division, and the Secretary
 - (c) more than \$500,000, the collecting unit must obtain two written, independent appraisals or informed estimates of fair market value and approval of the deaccession and disposal from the Office of the General Counsel, the appropriate Under Secretary or Director - International Art Museums Division, the Secretary, and the Board of Regents

3. Deaccession and Disposal
(Continued)

- (3) Smithsonian collecting units shall have a right of first refusal for collection items proposed for disposal, except as otherwise stipulated by authorizing legislation or other restrictions. Such transfers are without financial compensation, except when a collecting unit disposes of a collection item acquired through purchase.
 - (4) Proceeds realized from the disposal of collection items must be designated for additional collection acquisitions.
 - (5) The Secretary will report annually to the Board of Regents on deaccessions and disposals that have occurred during the reporting period.
- c. **Implementation.** Each collecting unit must
- (1) establish authority and assign responsibility to approve, document, and process deaccessions and disposals
 - (2) incorporate applicable guidelines for deaccessions and disposals set forth in the [SD 600 Implementation Manual](#)
 - (3) establish evaluation criteria for deaccessions and disposals
 - (4) establish appropriate methods of disposal
-

4. Preservation

Preservation is the protection and stabilization of collections, as well as their associated information, through a coordinated set of activities aimed at minimizing chemical, physical, and biological deterioration and damage and preventing loss of intellectual, aesthetic, and monetary value. Preservation is an ongoing process with the goal of making collections available for current and future use.

4. Preservation (Continued)

- a. **Principles.** The Smithsonian has a responsibility to preserve and safeguard the collections it holds in trust for the public. Preservation is a critical and integral component of professional museum management and ensures that collections are available for use. The Smithsonian's ability to carry out its mission is directly related to its ability to preserve its collections and the information inherent in them. In addition, it is important that the Smithsonian preserve collection records and other documentary materials that support collections.

The Smithsonian is responsible for developing and implementing preservation strategies and policies that respect the diverse nature of its collections, while providing access to the collections. Preservation standards are developed in accordance with the mission of the collecting unit and the purpose or needs of the collection. The scope, significance, and quality of Smithsonian collections make it imperative that current research and educational use of collections is balanced with the need to preserve collections for future generations.

b. **Policy**

- (1) The Smithsonian shall provide the necessary preservation, protection, and security for all collections acquired, borrowed, and in the custody of the Institution, including their associated information.
- (2) The Smithsonian will balance current research and educational use with the preservation requirements of collection items to ensure that collections are maintained for future generations and rightfully serve their intended purpose.

4. Preservation (Continued)

- (3) Any conservation intervention, restoration, destructive sampling, or consumptive use of collection items must be authorized, documented, and justified for the purpose of preservation or professional scholarship.
- c. **Implementation.** Each collecting unit must
 - (1) establish authority and assign responsibility for the preservation of collections
 - (2) incorporate applicable guidelines for preservation set forth in the [*SD 600 Implementation Manual*](#)
 - (3) establish and implement preservation policies, standards and procedures in accordance with the mission of the collecting unit and the nature, purpose, and use of the collections
 - (4) ensure that collections and their associated information are cared for and maintained in conditions that preserve and extend their physical and intellectual integrity for use in exhibition, research, and education

5. Collections Information

Collections information is the documentation of the intellectual significance, physical characteristics, and legal status of collection items, as well as the collections management processes and transactions they undergo. Collections information is part of an ongoing process with documentation residing in a combination of manual files, electronic information systems, and media formats.

- a. **Principles.** The documentary value of a museum collection is a principal criterion for its excellence. Well-documented results of scientific, historic, and aesthetic research enable the Smithsonian to fulfill its mandate to increase and diffuse knowledge. The value of collections information lies in its quality, integrity, comprehensiveness, and potential for use.

The primary purpose of collections information is to provide access to Smithsonian collections, research findings, and the stories they can tell. To support

**5. Collections
Information**
(Continued)

this goal, the Smithsonian has a responsibility to acquire, develop, and maintain collections information systems that enhance access to and accountability for its collections and research findings and to ensure long-term preservation of the resultant information in manual and electronic formats.

Collections information

- improves public and staff access to collections
- facilitates legal, physical, and intellectual control over collections
- enhances the informational integrity and value of collections as the foundation for research, exhibitions, publications, and educational programs

The Smithsonian is committed to the fundamental objective of effective use of its collections by placing collections information and images in computerized databases, maximizing the application of networked technologies, implementing professional documentation standards, and sharing collections information through collaborations among Smithsonian collecting units and with other educational and research institutions.

b. Policy

- (1) Collections information systems must support and meet Smithsonian and collecting unit missions and public access goals.
- (2) The Smithsonian seeks to provide the widest dissemination of collections information consistent with the stewardship responsibilities for its collections, associated documentation, and intellectual property rights.

**5. Collections
Information**
(Continued)

- (3) The Smithsonian will develop, implement, and maintain automated collections information systems to facilitate collections management and make collections information accessible to the general public, scholars, and Smithsonian staff for educational and research purposes.
 - (4) The provenance of acquired collection items is a matter of public record. Sensitive information involving privacy, collecting localities, intellectual property restrictions, security, and restricted use may constrain access to collections information.
 - (5) Collections information, including all records of collections-related decisions and activities, must comply with established collecting unit standards and be maintained according to accepted practice.
 - (6) The Smithsonian is responsible for collections data development, maintenance, preservation, and retention. All media containing collections information are maintained for long-term use and must be preserved according to current archival policy and standards.
- c. **Implementation.** Each collecting unit must
- (1) establish authority and assign responsibility for developing, managing, and preserving collections information
 - (2) establish authority and assign responsibility for developing and managing collections information systems
 - (3) incorporate applicable guidelines for collections information set forth in the [*SD 600 Implementation Manual*](#)
 - (4) define and establish a collections information policy to meet Smithsonian and collecting unit objectives

**5. Collections
Information**
(Continued)

- (5) establish documentation standards to ensure the quality, integrity, comprehensiveness, proper maintenance, management, and dissemination of collections information
- (6) maintain collections information of the historical, scientific, or aesthetic significance; legal status; provenance; and the use and management of its collections and collections in its custody
- (7) promote the widest dissemination of collections information consistent with its stewardship responsibilities

6. Inventory

Inventory is an itemized listing of collection items, groups, or lots that identifies the current physical location of each item, group, or lot; the process of physically locating all or a selection of items for which the museum is responsible; and appropriate information to facilitate research, collections management, security, and access.

Cyclical Inventory is a planned inventory of collection items, conducted according to a predetermined schedule. Cyclical inventories may include a complete inventory or a specific percentage or sampling of the entire collection inventory as predetermined using statistically sound inventory methods.

- a. **Principles.** Effective collections management requires a continuous inventory system to support decisions regarding collections use, growth, storage, and security. In addition to facilitating research, documentation, and storage, an ongoing inventory system is an essential security device to deter and detect theft of collection items. Inventory records serve as a tool for accountability, and are also useful in supporting other Smithsonian programs when augmented with additional documented information.

6. Inventory
(Continued)

Full inventory control requires creating and maintaining reliable information about the identification, location, and accessibility of collection items. Inventory is a critical component of ongoing collections documentation.

- b. **Policy.** In order to safeguard Smithsonian assets, assure compliance with applicable laws and regulations, and promote efficient use of resources, Smithsonian collecting units must create and maintain accurate and current inventory records.
- c. **Implementation.** Each collecting unit must
 - (1) establish authority and assign responsibility for conducting, supervising, and approving cyclical inventories and reconciliation of collection records
 - (2) incorporate applicable guidelines for inventory set forth in the [SD 600 Implementation Manual](#)
 - (3) establish and implement an inventory process and a written cyclical inventory plan appropriate to the character and size of the collections in its care in accordance with the [SD 600 Implementation Manual](#)
 - (4) ensure adequate separation of duties and other internal controls to minimize the possible unauthorized removal of collection items and corresponding records

7. Risk Management and Security

Risk management is the process of identification and evaluation of risk in order to prevent or minimize exposure to factors that may cause loss, damage, or deterioration of collections.

- a. **Principles.** The programmatic activities of the Smithsonian naturally involve an exposure of collections to risks of damage or loss. Exposure to risks can occur to a collection item when it is on exhibition or loan, in transit, in storage, or while

**7. Risk Management
and Security**
(Continued)

being studied, treated, or handled. Collections are exposed to a variety of risks that may be avoided, reduced, and insured through a systematic risk management assessment program.

Prudent collections management requires identification and elimination or reduction of risks to the collections. Risk management requires thoughtful review of potential hazards including natural disasters, vandalism, theft, disease, space and environmental deficiencies, human error, mechanical or operational system failure, and deterioration.

b. Policy

- (1) The Smithsonian will endeavor to minimize and control the level of risk of loss or damage to collections through established collections management practices.
- (2) Effective management controls are the responsibility of all Smithsonian managers and supervisors responsible for collections, who assure sufficient control and accountability in accordance with SD 115, *Management Controls*.
- (3) Smithsonian staff have the obligation to be aware of the Institution's risk management and security process. Staff must note and communicate to the appropriate office, in accordance with the guidelines set forth in the [*SD 600 Implementation Manual*](#), situations that create the potential for damage or loss to collections, personal injury, or legal liability.
- (4) Risk management and insurance is coordinated at the Smithsonian by the Office of the Treasurer's Risk Management Division and governed by SD 108, *Insurance and Risk Management*.

**7. Risk Management
and Security**
(Continued)

- (5) Security is coordinated at the Smithsonian by the Office of Protection Services.
 - (6) Except in extraordinary circumstances, the Smithsonian does not insure its own collections while they are in the care and possession of the Smithsonian. Collections on loan to the Smithsonian and Smithsonian collections on loan to or in the custody of others will be insured as stipulated by authorized loan agreement or negotiated contract.
 - (7) Insurance proceeds from the settlement of claims for damage to Smithsonian collections will be used for the conservation and restoration of the specific collection item. Insurance proceeds received on account of a total loss of a collection item or in excess of the cost of conservation and restoration of a damaged collection item will be designated for collections acquisition.
 - (8) The Smithsonian maintains a disaster preparedness program that includes planning, response, and recovery from major disasters as well as evaluation and assessment following an incident. All Smithsonian facilities, owned or leased, must have a written, comprehensive disaster preparedness plan as required by SD 109, *Disaster Preparedness*.
- c. **Implementation.** Each collecting unit must
- (1) establish authority and assign responsibility for risk management and security activities
 - (2) incorporate applicable guidelines for risk management and security set forth in the [SD 600 Implementation Manual](#)
 - (3) ensure that collections are maintained in controlled areas that are adequately protected against fire, theft, vandalism, and natural disaster

**7. Risk Management
and Security**
(Continued)

- (4) establish authority and assign responsibility for the development, implementation and coordination of the unit's disaster preparedness plan and program
 - (5) establish and implement a written comprehensive disaster preparedness plan for its facilities
 - (6) establish a security plan that protects the collections during both normal and high-risk activities
 - (7) establish procedures for immediately reporting and documenting damage, loss, or possible theft of collections in its custody and on loan
-

8. Access

Access is the opportunity for the general public, scholars, and Smithsonian staff to utilize the diverse collection resources of the Smithsonian Institution.

a. **Principles.** To carry out its mission for "the increase and diffusion of knowledge," the Smithsonian promotes access to its collections and associated information through research opportunities, traditional and electronic exhibitions, educational programs and publications, reference systems, loan and exchange of collections, and electronic information services.

b. **Policy**

- (1) The Smithsonian will provide reasonable access to its collections and collections information consistent with its stewardship responsibilities. Physical and intellectual access to the collections must be balanced against preservation and protection concerns.
- (2) In keeping with its stewardship responsibilities, the Smithsonian will control, monitor, and document all access to and use of collections.

8. Access
(Continued)

- (3) Access to collections and collections information may be restricted due to resource limitations, security, object availability, intellectual property rights, applicable restrictions, and preservation constraints.
 - (4) Access fees may be charged only according to approved collecting unit policies in accordance with guidelines set forth in the [SD 600 Implementation Manual](#).
 - (5) The Smithsonian Institution is not subject to the Freedom of Information Act (FOIA), which governs access by the public to federal agency records. The Smithsonian follows the intent and spirit of the law as a matter of policy. All requests citing FOIA must be referred to the Office of General Counsel.
- c. **Implementation.** Each collecting unit must
- (1) establish authority and assign responsibility to control, monitor, document, and provide access to physical collections and collections information
 - (2) incorporate applicable guidelines for access set forth in the [SD 600 Implementation Manual](#)
 - (3) establish policies, criteria, and procedures for permitting responsible access to physical collections and collections information

9. Loans

A *loan* is the temporary transfer of possession of collection items for an agreed purpose and on the condition that the collection item is returned at a specified time. Loans do not result in a change of ownership.

9. **Loans** (Continued)

- a. **Principles.** Lending and borrowing collection items for public exhibition, research, and education is an integral part of the Smithsonian's mission. Loans between Smithsonian collecting units are fundamental to Institutional programs, as are loans to and from other educational and scientific organizations.

The Smithsonian adheres to the *Guidelines for Exhibiting Borrowed Objects* issued by the American Association of Museums (AAM). The text of the guidelines is included in the [SD 600 Implementation Manual](#).

b. **Policy**

- (1) A collection item may be lent or borrowed only in accordance with established authority and only when consistent with applicable law and professional ethics.
- (2) As a general rule, Smithsonian collections will only be lent for public exhibition, research, and other educational purposes. Smithsonian collections may not be lent for commercial purposes or private pecuniary gain.
- (3) All loans are for a specified time period with option for renewal if appropriate. The Smithsonian does not permit indefinite or permanent loans.
- (4) Collections on loan to the Smithsonian and Smithsonian collections on loan to or in the custody of others will be insured as stipulated by an authorized loan agreement.
- (5) All loans to or from the Smithsonian must adhere to applicable federal, state, local, and international laws, treaties, and regulations.

9. Loans
(Continued)

- (6) The Smithsonian may charge loan fees in addition to actual expenses from borrowing organizations according to approved collecting unit policies in accordance with guidelines in the [SD 600 Implementation Manual](#).
 - (7) The Smithsonian lends collection items to high-ranking government officials according to guidelines established in the [SD 600 Implementation Manual](#).
 - (8) Collection loans that are part of an affiliation with another organization are subject to the Affiliation Policy adopted by the Board of Regents in September 1996, this directive, and guidelines for loans set forth in the [SD 600 Implementation Manual](#).
 - (9) Regardless of the length and type of loan, the Smithsonian retains fiduciary responsibility for the continued oversight of its collections.
- c. **Implementation.** Each collecting unit must
- (1) establish authority and assign responsibility to approve, process, document, and monitor loans
 - (2) incorporate applicable guidelines for loans set forth in the [SD 600 Implementation Manual](#)
 - (3) establish policies, criteria, and procedures for lending and borrowing collections
 - (4) apply the provisions of the AAM Guidelines specified above in its borrowing activities

10. Intellectual Property Rights

Intellectual property rights are rights and protections based on federal or state statutes or common law such as patent, trademark, copyright, privacy, and publicity.

10. Intellectual Property Rights
(Continued)

- a. **Principles.** The Smithsonian is both a holder and a user of intellectual property rights and therefore seeks to protect the intellectual integrity of collections and promote wide access to collections for educational purposes. In support of its mission to “increase and diffuse knowledge,” the Smithsonian strives to protect the intellectual property rights of creators and intellectual property owners, including the Institution itself as rights holder, and promote the responsible dissemination of knowledge.

Intellectual property rights are distinct from the right to possess the collection item itself and arise from its content. Holders of such rights may limit the uses that may be made of a collection item. The Smithsonian’s ability to use collection items or associated intellectual property may be subject to intellectual property rights held by others.

b. **Policy**

- (1) Smithsonian collections may be subject to intellectual property rights that may be owned by the Smithsonian or others. The Smithsonian will manage its collections and collections in its custody in a manner to avoid any infringement of intellectual property rights while promoting the widest possible dissemination of information about the collections. The Smithsonian will protect the intellectual property rights of creators and intellectual property owners, including the Institution itself as rights holder.
- (2) The Smithsonian may charge fees to outside organizations and individuals to use images of collection items. Image use and reproduction policies may reflect a fee schedule that distinguishes between different types of uses including educational, not-for-profit, and

10. Intellectual Property Rights
(Continued)

commercial purposes in accordance with SD 805, *Handling Outside Permission Requests to Use Smithsonian Images*, and the [SD 600 Implementation Manual](#).

- (3) The Smithsonian may rely on the doctrine of fair use in making reproductions of collections for standard museum purposes, such as archival, research, educational, exhibition, and other similar uses. Fair use determinations must be made on a case-by-case basis, taking into consideration the legal parameters of the fair use doctrine.
- c. **Implementation.** Each collecting unit must
 - (1) establish authority to approve permissible use of collections information and images and assign responsibility for rights management
 - (2) incorporate applicable guidelines for intellectual property rights set forth in the [SD 600 Implementation Manual](#)
 - (3) establish policies and procedures to ascertain whether collection items or proposed acquisitions are encumbered by intellectual property rights or other restrictions and to determine what steps are required to obtain any rights necessary for the intended use of the item
 - (4) establish policies and procedures for handling and documenting outside requests and permissions to publish or reproduce collections information and images in conformance with SD 805, *Handling Outside Permission Requests to Use Smithsonian Images*, and the [SD 600 Implementation Manual](#)
 - (5) determine permissible uses of its collections information and images consistent with the mission of the Smithsonian and collecting unit and establish appropriate fee schedules accordingly

10. Intellectual Property Rights
(Continued)

- (6) ensure that collection records are consulted for possible restrictions or prohibitions to determine permissible image use and reproduction by the Smithsonian and others in all media formats such as print, electronic, audio, video, and the Internet
-

11. Specific Legal and Ethical Issues

Certain types of collections present specific issues because of applicable legal and ethical standards. Collecting units that acquire, hold, or manage collections of these types must take these legal and ethical issues into account, including incorporating appropriate standards in the collecting unit collections management policy.

a. Native American and Native Hawaiian Human Remains and Objects

- (1) **Principles.** Native American and Native Hawaiian human remains, funerary objects, sacred objects, and objects of cultural patrimony are subject to the terms of the National Museum of the American Indian (NMAI) Act, as amended, 20 U.S.C. § 80q. Under the NMAI Act the Smithsonian is required to compile information about such material, to disseminate the information to and consult with tribes about collections that may be subject to repatriation, and, in certain circumstances, to return such material to affiliated Native American tribes, Native Hawaiian groups, or specified individuals. The Smithsonian Institution Repatriation Review Committee, established by the NMAI Act, serves as an advisory body to the Secretary or his designee on application of the NMAI Act. The applicable NMAI Act standards and guidelines for compliance are set forth in the [*SD 600 Implementation Manual*](#).

**11. Specific Legal and
Ethical Issues**
(Continued)

In addition to the applicable requirements of the NMAI Act, collecting units with Native American and Native Hawaiian collections should be aware of and sensitive to other issues that arise out of cultural concerns of Native American tribes or Native Hawaiian groups. Such concerns may relate to appropriate standards for the use and management of Native American or Native Hawaiian objects and interests in the intellectual content associated with such objects. Collecting units are encouraged to consult with Native American tribes and Native Hawaiian groups associated with objects in their collections and to take their interests into account in establishing policies for the management of these collections, provided that such policies are consistent with applicable law and the Smithsonian's duties for the care and management of its collections.

(2) Policy

- (a) Smithsonian repatriation of Native American and Native Hawaiian human remains and objects is governed by the requirements set forth in the National Museum of the American Indian Act, 20 U.S.C. § 80q (1989), as amended.
- (b) Final repatriation decisions are made by the Secretary or his designee, except for the collections of the National Museum of the American Indian. In accordance with the NMAI Act, the Board of Trustees of NMAI has sole authority to dispose of any part of NMAI collections. All repatriation decisions are subject to the general policies of the Board of Regents.

**11. Specific Legal and
Ethical Issues**
(Continued)

- (c) Any Native American or Native Hawaiian collections whose repatriation is not required by the NMAI Act shall be managed in accordance with this directive. Decisions to return or repatriate collection items outside the scope of the NMAI Act will be evaluated and processed in accordance with routine and established deaccession and disposal policies and criteria.

(3) Implementation

- (a) Each collecting unit must determine if its collections include Native American or Native Hawaiian materials to which the requirements of the NMAI Act may be applicable.
- (b) Any collecting unit with Native American and Native Hawaiian collections must
 - i. develop written policies and procedures consistent with the legal requirements of the NMAI Act as outlined in the [SD 600 Implementation Manual](#)
 - ii. assign responsibility to complete the inventories and summaries, according to requirements of the NMAI Act, and assess the cultural affiliation of the collections
 - iii. establish authority and assign responsibility to review, evaluate, document, and process repatriation requests and returns
- (c) Each collecting unit must establish authority and assign responsibility to review proposed acquisitions for applicability.

**11. Specific Legal and
Ethical Issues**
(Continued)

b. Cultural Property

- (1) **Principles.** The Smithsonian Institution Policy on Museum Acquisitions, adopted by the Board of Regents on May 9, 1973, confirms the Smithsonian support for efforts of local, state, national, and international authorities to protect art, antiquities, national treasures, and ethnographic material from destructive exploitation. The Smithsonian repudiates the illicit traffic in art and cultural objects that contributes to the despoliation of museums and monuments and the irreparable loss to science and humanity of archeological remains. Objects and specimens that have been stolen, unscientifically gathered or excavated, or unethically acquired should not be made part of Smithsonian collections. The Policy on Museum Acquisitions sets forth rules for the acquisition and borrowing of art, antiquities, and other specimens. The text of the Policy is included in the [SD 600 Implementation Manual](#).

(2) **Policy**

- (a) All collecting unit collections management policies and activities will comply with the Smithsonian Institution Policy on Museum Acquisitions.
- (b) Before acquiring or borrowing a collection item, the collecting unit must ascertain, from the circumstances surrounding the transaction or knowledge of the item's provenance, that the collection item was not stolen or wrongfully converted and is not illegally present in the United States.

11. Specific Legal and Ethical Issues
(Continued)

- (c) Before acquiring or borrowing a collection item, the collecting unit must ascertain that the collection item was not unethically acquired from its source, unscientifically excavated, or illegally removed from its country of origin after May 9, 1973.
- (d) The provenance of collection items shall be a matter of public record.
- (3) **Implementation.** Each collecting unit must
 - (a) establish authority and assign responsibility for ensuring compliance with the Policy on Museum Acquisitions
 - (b) incorporate applicable guidelines for acquiring, borrowing, and managing cultural property as set forth in the [*SD 600 Implementation Manual*](#)

c. **Biological Material**

- (1) **Principles.** The Smithsonian has long been a leader in the effort to halt the continuing degradation of the world's natural history and environmental resources. Smithsonian research and collecting activities must be undertaken with sensitivity to continued protection of biological diversity and in compliance with applicable laws protecting animal and plant species, especially those that are threatened or endangered. Field studies and collecting of biological material should be preceded by disclosure and consultation with the proper authorities and interested scientific institutions in the location of the fieldwork. Field activities must be conducted lawfully, support educational and scientific purposes, and not cause undue detriment to the biodiversity and ecological conditions in the area of the activity.

11. Specific Legal and Ethical Issues

(Continued)

(2) Policy

- (a) Biological material may be acquired by or on behalf of the Smithsonian through field collecting only when such collecting is legally authorized; the biological material is obtained solely for purposes of scientific research, to add to the Smithsonian collections, or for other educational purposes; and the Smithsonian's field activities will not cause undue detriment to the biodiversity and ecological conditions in the area of the activity.
- (b) The Smithsonian name may not be used to justify or support permit applications for activities that have not been authorized by or on behalf of the Smithsonian in accordance with this directive, the [SD 600 Implementation Manual](#), and collecting unit policy.
- (c) The Smithsonian will acquire or borrow biological material collected or obtained by others only if it is consistent with established collecting unit criteria for the transaction and applicable international, national, state, local, and tribal laws.
- (d) Biological material in Smithsonian collections or custody will be managed in accordance with applicable legal requirements.

- (3) **Implementation.** Each collecting unit with responsibility for biological materials must
 - (a) establish authority and assign responsibility to approve, document, and ensure compliance with legal requirements for all biological material collections transactions

11. Specific Legal and Ethical Issues
(Continued)

- (b) incorporate applicable guidelines for acquiring, borrowing, and managing biological material as set forth in the [SD 600 Implementation Manual](#)

d. **Unlawful Appropriation of Objects during the Nazi Era**

- (1) **Principles.** Between 1933 and 1945, the Nazi Regime caused the unlawful appropriation of millions of art objects and other cultural property from their rightful owners, including private citizens; victims of the Holocaust; public and private museums and galleries; and religious, educational, and other institutions. Some of these objects ultimately were transferred, in good faith and without knowledge of their prior unlawful appropriation, through the legitimate market and may have been acquired by museums. In recent years, public awareness of the extent and significance of Nazi looting of cultural property has grown significantly.

The Smithsonian adheres to the *Guidelines Concerning the Unlawful Appropriation of Objects During the Nazi Era*, issued by the American Association of Museums (AAM), and, where applicable, the *Report of the Association of Art Museum (AAMD) Directors Task Force on the Spoliation of Art during the Nazi/World War II Era*. The text of these documents is included in the [SD 600 Implementation Manual](#).

(2) **Policy**

- (a) The Smithsonian shall not knowingly acquire collection items that were unlawfully appropriated during the Nazi era without subsequent restitution.

**12. Specific Legal and
Ethical Issues**
(Continued)

- (b) If the Smithsonian has acquired in good faith a collection item that is subsequently determined to have been unlawfully appropriated during the Nazi era without restitution, the Smithsonian will take prudent and necessary steps to resolve the status of the collection item.
 - (c) Each collecting unit shall apply the applicable provisions of the AAM and AAMD guidelines to its collections management activities.
- (3) **Implementation.** Each collecting unit will
- (a) establish authority and assign responsibility to approve, document, and ensure compliance with Smithsonian policy on Nazi-appropriated objects and applicable guidelines
 - (b) incorporate applicable guidelines concerning Nazi-appropriated objects as set forth in the [SD 600 Implementation Manual](#)

CANCELLATION:	SD 600, May 11, 1992
INQUIRIES:	Smithsonian Institution Archives
RETENTION:	Indefinite. Subject to review for currency 24 months from date of issuance
FILING:	File sequentially with other current directives
COPIES:	Print file or contact the Office of Planning, Management and Budget (OPMB)

SMITHSONIAN COLLECTIONS MANAGEMENT GUIDELINES**Board of Regents****May 10, 1999****I. INTRODUCTION****A. Purpose**

This Statement provides guidelines and direction for the establishment and maintenance of Smithsonian Institution policy regarding collections management. The Smithsonian develops and adheres to authorized, written collections management policies to ensure the proper physical care and preservation of its collections; provide for the documentation of their identification, location, condition, and provenance; and assure maximum accessibility consistent with their preservation. To carry out these guidelines, the Secretary will establish appropriate directives to provide more detailed policies and requirements to be followed by all Smithsonian units with responsibility for collections.

B. Background

The Smithsonian develops, maintains, preserves, researches, interprets, and, in the case of living plants and animals, propagates, collections of art, artifacts, and natural specimens. The acquisition, preservation, management, and study of collections have been fundamental to the Smithsonian's mission since its creation, and have been the foundation upon which its reputation rests. Assembled over the past 150 years, the national collections are central to many of the core activities and to the vitality and significance of the Smithsonian. Collections serve as an intellectual base for scholarship, discovery, exhibition, and education. Collections also provide content for Smithsonian ventures such as publishing, licensing, and media projects.

Each Smithsonian collecting unit maintains its own unique collection, purpose, character, and role in the increase and diffusion of knowledge. Among the vast collections are irreplaceable icons of the nation, examples of common life, and scientific material vital to the study of the world's natural and cultural heritage. Smithsonian collections comprise a diverse array, including: works of art, historical artifacts, specimens of life and physical sciences, living animals, photographs, moving images, archival documents, electronic data, audio records, books, and manuscripts. Together, they preserve the past, increase our understanding of society and the natural world in which we live, and support the research that expands human knowledge in the arts, humanities, and sciences alike. The scope, depth, and unparalleled quality of these collections make it

imperative to ensure that they are properly preserved and made accessible for current and future generations to behold, enjoy, and study.

C. Authority and Responsibility

The acquisition and possession of collections imposes legal and ethical obligations to provide proper management, preservation and care for the collections and their associated information. To carry out these obligations, the Smithsonian is responsible for assuring that:

- the scope of each collection supports the Smithsonian and collecting unit mission,
- collections growth is balanced with available resources,
- personnel, facilities, equipment, and other resources are reasonably allocated to meet the on-going needs of the collections, and
- prudent collections management policies are established, implemented, and monitored.

The Board of Regents has ultimate authority for Smithsonian collections, which are dedicated to furthering the Smithsonian's mission for the increase and diffusion of knowledge. The Board of Regents delegates to the Secretary operational authority for the collections. The Secretary is responsible for establishing and overseeing appropriate policies and programs and ensuring compliance with applicable laws and regulations. The Secretary may delegate to the Provost, Under Secretary, collecting unit directors, and other appropriate staff the responsibility to implement established policies and carry out the direct management and care of Smithsonian collections.

A collecting unit may have an advisory Board or Commission, created by the Board of Regents or pursuant to federal statutes, to provide advice and assistance to the Board of Regents, Secretary, and collecting unit directors concerning collections management issues. The role of advisory Boards and Commissions with respect to collections shall be specified in bylaws approved by the Board of Regents. By statute or legal agreement, the Boards of the Archives of American Art, Hirshhorn Museum and Sculpture Garden, and National Museum of the American Indian have been given sole authority for specified collections management decisions. This authority shall be carried out in accordance with the general policies of the Board of Regents and in applicable directives established by the Secretary to implement these guidelines.

D. Ethics

The Smithsonian recognizes and accepts its fiduciary responsibility to provide proper management, preservation, and use of the collections and associated information it holds for the benefit of the public. Smithsonian staff have legal, ethical, and professional obligations to maintain high levels of honesty, integrity, and loyalty to the Institution. These standards of performance are set forth in the Smithsonian Standards of Conduct (Smithsonian Directive 103) and professional codes of ethics. All collections management activities must adhere to applicable standards of conduct and professional ethics.

E. Accounting for Collections

Smithsonian collections are held for public exhibition, education, or research in furtherance of public service rather than financial gain. They are protected, kept unencumbered, cared for, and preserved, and are subject to the requirement that proceeds from sales of collections are to be used to acquire other collection items. Accordingly, the Smithsonian does not treat its collections as “assets” for purposes of reporting in its financial statements. The Smithsonian adheres to the applicable financial reporting standards governing collections held in public trust.

II. POLICY GUIDELINES

Applicable Smithsonian directives on collections management shall include the following policies. Prudent exceptions to these policies may be permitted in appropriate cases when in the best interests of the Smithsonian. The Secretary will establish guidelines and a process for review and approval of requests for exceptions.

A. Acquisition

Collections may be acquired only in accordance with established authority and only when consistent with applicable law and professional ethics. Applicable federal, state, local, and international laws, treaties, and regulations will be observed and documented. Each collecting unit must ensure documentation of legal title of collection items acquired.

All collections acquired must be in compliance with the Smithsonian Institution Policy on Museum Acquisitions (May 9, 1973) and Smithsonian Policy on Collecting Biological Specimens (February, 1992).

B. Deaccession & Disposal

Collections may be deaccessioned and disposed of only in accordance with established authority and only when consistent with applicable law and professional ethics. Applicable federal, state, local, and international laws, treaties, and regulations and any other applicable restrictions will be observed and documented.

Prudent collections management includes judicious consideration of appropriate deaccessioning and disposal. The periodic review, evaluation, and deaccessioning and disposal of existing collections is intended to refine and improve the quality and relevance of the collections with respect to the Smithsonian's mission and purpose.

The Secretary will establish guidelines and a process for review and approval of proposed deaccessioning of collections, which shall include approval by the Board of Regents of significant deaccessions. The Secretary will report annually to the Board on all deaccessions that have occurred during the reporting period.

Smithsonian collecting units shall have a right of first refusal for collection items proposed for disposal, except as otherwise stipulated by authorizing legislation or other restrictions. Such transfers are without financial

compensation, except when a museum disposes of a collection item acquired through purchase.

Proceeds realized from the disposal of collection items must be designated for additional collection acquisitions.

C. Native American Human Remains and Objects

Smithsonian repatriation of Native American and Native Hawaiian human remains and objects is governed by the requirements set forth in the National Museum of the American Indian Act, 20 U.S.C. § 80q et seq. (1989), as amended (the "NMAI Act"). The Secretary will establish guidelines for implementation of the requirements of the NMAI Act.

Any Native American or Native Hawaiian collections whose repatriation is not required by the NMAI Act shall be managed in accordance with generally applicable directives established by the Secretary.

D. Preservation

The Smithsonian shall provide the necessary preservation, protection, and security for all collections acquired, borrowed, and in the custody of the Institution including their associated information. Activities that involve collections must not compromise the preservation requirements of the collection items.

E. Risk Management & Security

The Smithsonian shall endeavor to minimize and control the level of risk of loss or damage to collections through established collections management practices.

Except in extraordinary circumstances, the Smithsonian does not insure its own collections while they are in the care and possession of the Smithsonian. Collections on loan to the Smithsonian and Smithsonian collections on loan to or in the custody of others will be insured in accordance with guidelines and directives established by the Secretary.

F. Inventory

In order to safeguard Smithsonian assets, assure compliance with applicable laws and regulations, and promote efficient use of resources, Smithsonian collecting units must establish and implement a cyclical inventory plan and maintain accurate and current inventory records in

accordance with the guidelines and directives established by the Secretary.

G. Access

The Smithsonian will provide reasonable open and equal access to its collections and collections information consistent with its stewardship responsibilities. Physical and intellectual access to the collections must be balanced against preservation and protection concerns. Access to collections and collections information may be restricted due to resource limitations, security, object availability, intellectual property requirements, applicable restrictions, and preservation constraints.

H. Loans

As a general rule, Smithsonian collections will only be lent for research, educational and other non-profit purposes. Smithsonian collections may not be lent for commercial purposes or private pecuniary gain. All loans to or from the Smithsonian must adhere to applicable federal, state, local, and international laws, treaties, and regulations.

Collection loans that are part of an affiliation with another organization shall be governed by the Affiliation Policy adopted by the Board of Regents in September 1996 and applicable affiliation guidelines established by the Secretary.

I. Documentation

The Smithsonian seeks to provide the widest dissemination of collections information consistent with the stewardship responsibilities for its collections, associated information, and intellectual property rights. Collecting units must maintain documentation of the historical, scientific, or aesthetic significance; legal status; provenance; and the use and management of its collections and collections in their custody, in accordance with directives established by the Secretary.

The Secretary will establish guidelines and standards for collections documentation that will ensure appropriate legal and intellectual control of the collections.

J. Intellectual Property Rights

Smithsonian collections may be subject to intellectual property rights that may be owned by the Smithsonian or others. The Smithsonian will manage its collections in a manner to avoid any infringement of intellectual property rights while promoting the widest possible dissemination of information about the collections.

SMITHSONIAN INSTITUTION

OFFICE MEMORANDUM OM 777 (Rev)

December 15, 1982

TO: Heads of organization units

SUBJECT: Office of Elementary and Secondary Education

The principal role of the Office of Elementary and Secondary Education (OESE) is to make Smithsonian resources for learning available to both the local and the national school communities. The Office provides training and orientation for teachers and students. It coordinates information exchanges between schools and the activities of the Institution's museums, galleries and research centers. Information on various programs available to schools is published and disseminated by OESE in the Washington metropolitan area and across the nation. While each Smithsonian museum or research director is responsible for educational efforts integral to programs carried out in his or her own museum, the OESE focuses its attention on programs that are institutional in scope. In addition, the Office provides, through conferences, meetings and a central clearing house, opportunities for exchange of information among the Smithsonian's education offices, and between those offices and local schools.

The office is also responsible for facilitating program accessibility to educational opportunities for disabled visitors in accord with established policies, which are guided by the Office of Equal Opportunity. Responsibilities regarding program accessibility for the disabled are centered upon implementation of such efforts on an institutional basis, providing advice and assistance to bureau education programs, and the development of interpretive materials tailored to various disabilities.

OESE program activities include but are not limited to:

- ° planning and conducting teacher workshops and seminars
- ° development of audiovisual materials for classroom use
- ° preparation of publications distributed to schools, including a summary guide of Smithsonian educational opportunities and a national newsletter for teachers
- ° conducting a summer intern program for high school students and a career awareness program for junior and senior high school students
- ° preparing educational outreach materials for institutions such as schools, libraries, and children's hospitals. In addition, offices which produce slides, films, filmstrips, television and radio programming within the Institution specifically for elementary and secondary school audiences should consult with OESE.

The Office of Elementary and Secondary Education should also be kept informed of grant proposals for elementary and secondary education involving more than one bureau or activity.

S. Dillon Ripley
S. Dillon Ripley
Secretary

CANCELLATION:	OM 777 dated October 1, 1974
INQUIRIES:	Office of Elementary and Secondary Education
FILING INSTRUCTIONS:	File this OM in numerical sequence with other current Office Memoranda.
RETENTION:	Indefinite. This OM is subject to review for currency 18 months from date hereof.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 603

November 6, 2003

EXHIBITION PLANNING

Background	1
Definitions	3
Purpose	3
Authority	4
Accountability	4
Guidelines	5

Background

In 1995, the Report of the Commission on the Future of the Smithsonian Institution observed that:

Museums in general, and the Smithsonian in particular, are increasingly flash points in the debates that characterize our nation's transition from a society that depends for coherence on a single accepted set of values and practices to one that derives its strength and unity from a deep tolerance of diversity. This happens because museums, to fulfill their missions, must prepare exhibitions that record and illuminate this transition. This sometimes results in acrimonious and contentious debate on controversial subjects. The Smithsonian has hardly been immune. Its position is especially challenging because it is a national institution with large and complex collections and missions.

Background
(Continued)

The Smithsonian Institution is the repository for millions of objects and specimens that are housed in its 16 museums and storage facilities in Washington, D.C., New York City, Maryland, Virginia, and elsewhere. In addition, the Smithsonian's National Zoological Park and several other scientific research facilities maintain living collections that include hundreds of species of animal and plant life. The Smithsonian also sends traveling exhibitions throughout the United States and abroad.

Millions of visits are made annually to Smithsonian exhibitions by individuals with motivations such as education, entertainment, nostalgia, and patriotism. Visitors expect to have authentic experiences in exhibitions at the Smithsonian, especially with objects that are unique, authentic, and iconic. Smithsonian exhibitions are meant to be stimulating, and the Institution remains open to lively discussion and debate of relevant intellectual and social issues.

The Smithsonian is committed to serious and sound scholarship, to preserving and making accessible the National Collection, and to creating accurate, balanced, and high-quality interpretations of objects on exhibition for the visiting public. Each museum and exhibiting unit has established a procedure for developing exhibitions according to subject matter, resources, and visitor expectations.

Those procedures are expected to adhere to the policies and procedures outlined in this directive.

Definitions

The following definitions apply in the context of this directive:

Exhibition: Any public display that includes one or more artifacts, objects, specimens, photographs, illustrations, art, or digital images or may include props and informative panels. Smithsonian museums and units create exhibitions that vary in size, scope, type, and intent. Exhibitions which travel to Smithsonian museums and exhibiting units from other organizations are also subject to these policies.

Sensitive issues: Issues on which curators, scholars, or segments of the public may disagree on substantive grounds as to the presentation or contents of an exhibition.

Under Secretary: The appropriate Smithsonian Institution Under Secretary or the Director of the International Art Museums Division.

Purpose

The objectives of this directive are:

- to stimulate thoughtful analysis and refinement of established practices for creating exhibitions
 - to maintain a system for reviewing and updating on a regular basis exhibition planning guidelines specific to each museum or exhibiting unit to ensure that appropriate mechanisms are in place for key issues, such as establishing project management systems to deliver projects on time and within budgets, monitoring exhibition content for accuracy and quality, implementing external and internal evaluations, providing intellectual and physical accessibility, and managing potentially sensitive issues
 - to identify accountability at all levels
-

Authority

The Under Secretary is authorized to review guidelines for Smithsonian museums and other exhibiting units reporting to the Under Secretary and to assist in the creation or revision of those guidelines as appropriate. In each case, the guidelines must conform to the general principles stated in this directive. The guidelines will be reviewed periodically by the unit and the Under Secretary for effectiveness. When a need for improvement is identified, changes will be monitored by the Under Secretary.

Accountability

Each museum Director is responsible for establishing guidelines for the selection and approval of exhibitions at each museum or other exhibiting unit and is accountable for the results to his or her Under Secretary. The guidelines for each museum and unit must assign accountability and responsibility at each stage of the exhibition development process. In general, each museum is accountable for presenting information that is grounded in sound, fact-based scholarship, that is apolitical in tone, and that also respects the diverse perspectives of groups and individuals. If the contents of an exhibition represent a single point of view and are attributable to a source outside the Smithsonian, the author must be identified.

The Secretary of the Smithsonian Institution has final authority to approve or disapprove any Smithsonian exhibition at his discretion, at any stage of the process.

Guidelines

Basic Issues

- A. The guidelines for each museum and exhibiting unit must clearly state policies and procedures for exhibition activities and outline mechanisms for the review and approval of documents emerging from the planning and production processes. The procedures employed in these reviews will differ by unit and project, but incorporating them into established exhibition development and implementation processes is essential. Unit guidelines must clearly state that all exhibition plans, drawings, and scripts are preliminary until final approval is secured.
- B. Guidelines for exhibit content provided or produced by non-Smithsonian scholars or using scholarship from outside the Smithsonian, whether for short-term, a traveling exhibition, or long-term, must include designation of a Smithsonian curator, exhibition developer, or expert with sufficient knowledge and authority for exhibit review and accountability. Exhibitions must clearly reflect or complement the mission and objectives of the unit proposing it.
- C. Each exhibition must have (1) a clear statement of purpose that accurately articulates its scope and content, areas of Smithsonian expertise, and how the exhibition will serve the mission and objectives of the unit proposing it; (2) goals and benchmarks for evaluation; (3) interpretive strategies to achieve those goals; and (4) labels and other elements (e.g., multimedia, interactive) that are physically and intellectually accessible and whose authorship, if appropriate, is publicly stated (see **Accountability**).

Guidelines
(Continued)

- D. The roles and responsibilities of key Smithsonian participants in the exhibition development and implementation processes and their relationship to each other must be established as part of the guidelines for each unit. The units' guidelines should clearly identify Smithsonian participants who have authority and accountability for the review and approval of exhibition content and labels, and all participants should be provided copies of the guidelines.
- E. Proposed exhibitions must be discussed early in the planning process with senior staff of the museum or other unit as well and, for those that might be considered sensitive, with the Under Secretary. Each unit should provide senior staff with the procedures governing the development and approval of all proposed exhibitions.
- F. At every stage of exhibition planning, development, and implementation, the Director and relevant staff should review and analyze the exhibition's overall budget and currently available and anticipated resources to ensure that they are sufficient to present the subject matter.
- G. Advisory groups must be considered for major projects and convened at the earliest possible time. Smithsonian staff must clearly communicate the roles of all participants, furnish copies of the unit guidelines, and provide outside advisors with clear evidence that their advice is being fully considered.
- H. Scripts must be accurate and should minimize the use of technical and arcane language. When specialized terms are used, definitions are appropriate.

Guidelines
(Continued)

- I. Museum or unit public affairs staff must collaborate with researchers and others to understand fully the scope and point of view of an exhibition and its supporting scholarship. Smithsonian staff raising funds for exhibitions also should consult regularly with the museum or unit Director in order to ensure that conflicts do not arise between the expectations of supporters and those of staff involved in developing exhibits. Any gift agreement providing funding for an exhibition must contain a provision declaring the Smithsonian's sole control of the exhibition's content.
- J. Each museum or unit Director and the Under Secretary are responsible for monitoring adherence to official Smithsonian policies regarding accessibility in exhibitions. The Smithsonian Office of Accessibility and other appropriate officers must be consulted during the exhibition planning process to ensure accessibility.
- K. Good exhibition planning includes the scheduling of all stages, including opening ceremonies. The existence of potentially competing special events must be taken into account from the outset of planning.

Sensitive Issues

- A. For each exhibition, museums and exhibiting units need to identify the exhibition's targeted audience and those audiences who may have concerns about the exhibition topic or approach. Where desirable, so that the presentations can best relate to the characteristics of the audience(s), exhibiting units shall collect and analyze information about the experiences and expectations of visitors and others during the exhibition planning phases and through assessment of audience responses to the

Guidelines
(Continued)

completed exhibition. For example, the use of focus groups may be part of the planning process. The results of these activities should become part of the museums' and exhibiting units' lessons learned about exhibition content, design, and presentation.

- B. Museums and exhibiting units, in concert with the Under Secretary, must establish mechanisms to identify potentially sensitive issues. Museums and exhibiting units should address these issues by carefully reviewing the topic and approach to determine whether changes in direction or in degree of emphasis or balance are appropriate, even if the viewpoints are based on solid scientific evidence or scholarly interpretation. They should plan various options for handling a range of public responses, which may include identifying spokespersons for the exhibition's point of view or organizing forums to present different perspectives on the subject matter.
- C. When sensitive issues arise, the exhibiting unit will notify the responsible unit Director. The Director will bring the matter to the attention of the Under Secretary, who will monitor the issue and consult with the Office of Government Relations and the Director of Communications or other senior staff, as necessary, to ensure the Smithsonian is prepared to deal with public debate or questions from the public, news media, Congress and the Administration.

CANCELLATION:
INQUIRIES:
RETENTION:

SD 603, August 25, 1995
Office of the Secretary
Indefinite. Subject to review for currency 24 months from date of issue

RESEARCH INVOLVING HUMAN SUBJECTS

Purpose	1
Applicability	1
Policy	1
Definitions	2
Responsibilities	5
Process	8
Additional Guidelines	10
Appendix A, Categories of Research that May Receive an Expedited Review	

Purpose

The purpose of this policy is to ensure that all Smithsonian Institution (SI) research involving human subjects complies with applicable federal laws, regulations, and ethical principles, so that the rights and welfare of the human subjects involved in research are protected.

Applicability

This directive applies to all Smithsonian research involving human subjects (as defined herein), conducted anywhere in the world, regardless of the funding source used. This includes research conducted by any Smithsonian employee or associate; research using any Smithsonian resource, property, or facility; and research using Smithsonian non-public information to identify or contact prospective human subjects.

The Smithsonian Astrophysical Observatory (SAO) uses an independent Institutional Review Board for human subject research in coordination with Harvard University.

Policy

The Smithsonian acknowledges and accepts its responsibility to minimize risks to human research subjects and to ensure that their participation is based on informed consent. To fulfill this responsibility, all

Policy (continued)

individuals engaged in research involving human subjects must understand their personal and collective responsibilities for compliance with this policy and any applicable federal, state, local, or institutional laws, regulations, and policies pertaining to human subjects.

To the extent applicable, the Smithsonian Institution will comply with the Federal Policy for the Protection of Human Subjects, also known as the Common Rule (*Code of Federal Regulations* [CFR] Title 45, Part 46 — Protection of Human Subjects), which is available on the Internet at

<http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html>.

In addition, the Smithsonian Institution is guided by the ethical principles set forth in the report of the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, entitled: *Ethical Principles and Guidelines for the Protection of Human Subjects of Research* (i.e., the “Belmont Report”), which is available at

<http://www.hhs.gov/ohrp/humansubjects/guidance/belmont.html>.

Investigators must also follow the codes of ethics applicable to their particular disciplines. Investigators are responsible for ensuring that the rights and welfare of human subjects participating in SI activities are protected, whether or not those activities are formally defined as human subject research under this policy directive.

Definitions

Human subject — A living individual about whom an investigator conducting research obtains (1) data through intervention or interaction with the individual; or (2) identifiable private information.

Research — A systematic investigation, including study, development, testing and evaluation, designed to contribute to generalized knowledge.

Research includes the measuring, taking, or testing of a subject’s bodily tissue, psychological testing, formal interviews, responses to questionnaires, and related activities that are quantified as part of study data.

Definitions
(continued)

For the purpose of this directive, human subject research *does not* include:

- interviews used to provide quotes or illustrative statements, such as those used in journalism;
- collection(s) of oral histories and cultural expressions (e.g., stories, songs, customs, and traditions and accounts thereof) to document a specific historical event or the experience of individuals without intent to draw statistically or quantitatively-based conclusions or generalizations;
- gathering of information from a person to elucidate a particular item (or items) in a museum collection;
- gathering of information from a person to assess suitability for and/or supplement a public program, publication, or cultural performance; or
- survey procedures, interview procedures, or observations of public behavior that are conducted for Smithsonian internal purposes only, the results of which will not be published or presented in a public setting (e.g., at conferences or professional meetings).

Assurance of Protection for Human Subjects or Federal Wide Assurance (FWA) — A written agreement, submitted by any institution partaking in research involving human subjects that ensures such research will comply with all federal standards for the protection of human research subjects.

Informed consent — An agreement to participate in research that is made voluntarily by an individual after disclosure of all material information about the research, including foreseeable risks and benefits. The methods used to obtain informed consent will vary depending on the nature of the research, the risks involved, the research setting, the study participants, and any applicable policies, laws, and regulations.

Definitions
(continued)

Intervention — This includes both physical procedures by which data are gathered and manipulations of the subject or the subjects' environment that are performed for research purposes.

Institutional Review Board (IRB) — An appropriately constituted group formally designated by the Secretary to review, monitor, and approve any research involving human subjects. This board consists of at least five members with varying backgrounds to evaluate research in terms of institutional commitments and regulations, applicable law, and standards of professional conduct and practice.

Principal Investigator or Exhibitor — A Smithsonian employee or associate who is responsible for proposing and directing a research project covered by this policy. The terms "Principal Investigator," "Responsible Investigator," "Project Director," "Program Director," "Researcher," "Curator," and "Exhibitor" are interchangeable with the term "Investigator" if such individuals conduct research covered by this policy.

Private information — Information about behavior that occurs in a context in which an individual can reasonably expect that no observation or recording is taking place, and information provided for specific purposes by an individual and that the individual can reasonably expect not to be made public (e.g., test scores, fiduciary records or medical records). Obtaining private information may constitute "research involving human subjects" if the information is individually identifiable. Information is individually identifiable if the identity of the subject about whom the information pertains is or may be readily ascertained by the researcher or could be associated with the subject by anyone reviewing the research.

Smithsonian associates — Individuals (other than Smithsonian employees) using any Smithsonian resource, property or facility, including Fellows, visiting scientists, scholars, students, and research associates. The term also includes employees of tenant agencies.

Definitions
(continued)

Sponsor — Any organization (e.g., a foundation, corporation, or federal agency) that funds a research project, exhibit, or other type of activity.

United States Department of Health and Human Services, Office for Human Research Protection (OHRP) — The federal office that provides leadership and oversight on all matters related to the protection of human subjects participating in research conducted or supported by the U.S. Department of Health and Human Services (DHHS).

Responsibilities

The Secretary of the Smithsonian (or designee) is responsible for:

- serving as the Institution's Signatory Official;
- appointing the IRB chairperson(s) and members;
- ensuring that all investigators collaborating on research involving human subjects operate under the appropriate FWA;
- ensuring that the review process is both compliant and efficient, so that opportunities for the advancement of knowledge are not unnecessarily impeded; and
- establishing training and oversight mechanisms to ensure that research investigators, IRB members and staff, and other appropriate personnel maintain knowledge of, and comply with, relevant federal regulations, state and local laws, institutional regulations, and policies for the protection of human subjects.

The Institutional Review Board (IRB) is responsible for:

- conducting reviews and approving or disapproving all proposals for human subject research;
- reporting to the Secretary and to the Office of Sponsored Projects (OSP) any suspension or

Responsibilities
(continued)

termination of IRB approval, or any serious or continuing noncompliance with the regulations or determinations made by the IRB, or any other unanticipated problems involving risks to human subjects or others; and

- developing IRB procedures and maintaining all documentation of IRB activities.

Unit directors are responsible for:

- ensuring that employees, associates, and volunteers comply with this directive; and
- ensuring that any unit staff proposing, conducting, or assisting with research involving human subjects, as defined by this directive, have completed the online training in the ethical treatment of human subjects in research, which is available at <http://phrp.nihtraining.com/users/login.php>.

Principal Investigators (PIs) are responsible for:

- completing online training in the protection of human subjects in research, prior to engaging in research that meets the definitions of human subject research in this directive (see <http://phrp.nihtraining.com/users/login.php>);
- submitting proposals for all research involving human subjects to the IRB for approval or exempt determination prior to commencing research;
- ensuring the IRB understands the unique local laws applicable to the research that will be conducted;
- supervising activities related to the use of human subjects in their projects, including obtaining the appropriate informed consent;
- submitting progress reports on ongoing approved research to the IRB for its review;

Responsibilities
(continued)

- ensuring their project staff complete the online training in the protection of human subjects in research, as defined by this directive (see <http://phrp.nihtraining.com/users/login.php>);
- obtaining from independent or collaborating investigators (who are not otherwise affiliated with the Smithsonian) a written agreement evidencing their commitment to relevant human subject protection policies and IRB review, either by their own institution or by the Smithsonian; and
- reporting proposed changes in a research activity, unanticipated problems with a research activity involving risks to humans and/or noncompliance to the IRB.

The Under Secretary for History, Art, and Culture (USHAC) and the Director, Smithsonian Astrophysical Observatory (SAO) (or their designees) are responsible for:

- collecting relevant information from the IRB and reporting, as needed, to the DHHS OHRP;
- guaranteeing that IRB approval has been obtained prior to acceptance of a grant or contract;
- ensuring that prepared reports are distributed to the DHHS or other federal agencies, as required;
- developing, maintaining, and submitting the FWA;
- providing a copy of IRB procedures to the DHHS OHRP or any department or agency upon request; and
- ensuring that the Secretary and the IRB are updated on changes made to applicable human subject research laws and regulations.

Smithsonian employees and associates are responsible for reporting incidents involving the unethical treatment of human subjects and any

Responsibilities
(continued)

noncompliance with this policy or the requirements or determinations of the IRB.

Process

Exemptions

The following human subject research activities may be exempt from IRB approval and oversight:

1. Research conducted in established or commonly accepted educational settings, involving normal educational practices, such as (i) research on regular and special education instructional strategies, or (ii) research on the effectiveness of or the comparison among instructional techniques, curricula or classroom management methods.
2. Research involving the use of educational tests (e.g., cognitive, diagnostic, aptitude or achievement), survey procedures, interview procedures or observation of public behavior, unless: (i) information obtained is recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects; and (ii) any disclosure of the human subjects' responses outside the research could reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability or reputation.
3. Research involving the use of educational tests (e.g., cognitive, diagnostic, aptitude or achievement), survey procedures, interview procedures or observation of public behavior that is not exempt under item number 2 above, if (i) the human subjects are elected or appointed public officials or candidates for public office; or (ii) federal statute(s) require(s) without exception that the confidentiality of the personally identifiable information will be maintained throughout the research and thereafter.

Process (continued)

4. Research involving the collection or study of existing data, documents, records, pathological specimens or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that subjects cannot be identified, directly or through identifiers linked to the subjects.
5. Research and demonstration projects conducted by or subject to the approval of department or agency heads, and that are designed to study, evaluate, or otherwise examine: (i) public benefit or service programs; (ii) procedures for obtaining benefits or services under those programs; (iii) possible changes in or alternatives to those programs or procedures; or (iv) possible changes in methods or levels of payment for benefits or services under those programs.
6. Taste and food quality evaluation and consumer acceptance studies meeting certain Food and Drug Administration (FDA), Environmental Protection Agency (EPA) and United States Department of Agriculture (USDA) requirements (see the Common Rule for specifics).

Review of proposals for human subject research in the foregoing categories may be carried out by the IRB chairperson(s) or by one or more experienced reviewers designated by the chairperson(s) from among the members of the IRB. Determination that human subject research falls within the foregoing categories and is exempt from IRB approval and oversight is subject to the discretion of the designated IRB reviewer.

Expedited Review

The Secretary of DHHS has established a list of categories of research, found in Appendix A, which may be reviewed by the IRB through an expedited review procedure. The IRB may use the expedited review procedure to review either or both of the following:

- Process** (continued)
- a) some or all of the research appearing on the list (Appendix A) and found by the reviewers to involve no more than minimal risk;
 - b) minor changes to previously approved research during the period (of one year or less) for which approval is authorized.

Under an expedited review procedure, review of proposals for human subject research may be carried out by the IRB chairperson(s) or by one or more experienced reviewers designated by the chairperson(s) from among members of the IRB. The reviewers may exercise all of the authority of the IRB except that the reviewers may not disapprove the research. If the expedited reviewers cannot approve the research, the research will be reviewed by the full IRB.

**Additional
Guidelines**

Additional guidance to supplement this policy can be found in the following documents:

- *OSP Compliance Policies*, which is available on PRISM at <http://prism.si.edu/osp/policies/policies.htm#Compliance>;
 - SD 604, Misconduct in Research (available on PRISM);
 - SD 321, Review and Submission of Proposals for Sponsored Projects (available on PRISM);
 - 45 *Code of Federal Regulations* (CFR) 46, also known as the Common Rule; and
 - *Ethical Principles and Guidelines for the Protection of Human Subjects of Research* (also known as the Belmont Report), which is available at <http://www.hhs.gov/ohrp/humansubjects/guidance/belmont.htm>
-

CANCELLATION:
INQUIRIES:
RETENTION:

Not applicable (N/A)
Office of Sponsored Projects (OSP)
Indefinite. Subject to review for currency 24 months from date of issue.

June 30, 2009

**CATEGORIES OF RESEARCH THAT MAY BE REVIEWED
BY THE INSTITUTIONAL REVIEW BOARD THROUGH AN EXPEDITED
REVIEW PROCEDURE**

General Information

The following guidelines are available online at the Department of Health and Human Services' (DHHS) Office for Human Research Protection (OHRP) webpage at <http://www.hhs.gov/ohrp/policy/expedited98.html>.

- 1) Clinical studies of drugs and medical devices only when condition (a) or (b) is met.
 - a) Research on drugs for which an investigational new drug application (21 *Code of Federal Regulations* [CFR] Part 312) is not required. (Note: Research on marketed drugs that significantly increases the risks or decreases the acceptability of the risks associated with the use of the product is not eligible for expedited review.)
 - b) Research on medical devices for which (i) an investigational device exemption application (21 CFR Part 812) is not required; or (ii) the medical device is cleared/approved for marketing and the medical device is being used in accordance with its cleared/approved labeling.
- 2) Collection of blood samples by finger stick, heel stick, ear stick, or venipuncture as follows:
 - a) from healthy, nonpregnant adults who weigh at least 110 pounds. For these subjects, the amounts drawn may not exceed 550 ml in an eight-week period and collection may not occur more frequently than two times per week; or

General Information
(continued)

- b) from other adults and children¹, considering the age, weight, and health of the subjects, the collection procedure, the amount of blood to be collected, and the frequency with which it will be collected. For these subjects, the amount drawn may not exceed the lesser of 50 ml or 3 ml per kg in an eight-week period and collection may not occur more frequently than two times per week.
- 3) Prospective collection of biological specimens for research purposes by noninvasive means.
Examples are as follows:
- a) hair and nail clippings in a nondisfiguring manner;
 - b) deciduous teeth at a time of exfoliation or if routine patient care indicates a need for extraction;
 - c) permanent teeth if routine patient care indicates a need for extraction;
 - d) excreta and external secretions (including sweat);
 - e) uncannulated saliva collected either in an unstimulated fashion or stimulated by chewing gumbase or wax or by applying a dilute citric solution to the tongue;
 - f) placenta removed at delivery;
 - g) amniotic fluid obtained at the time of rupture of the membrane prior to or during labor;
 - h) supra- and subgingival dental plaque and calculus, provided the collection procedure is not more invasive than routine prophylactic scaling of the teeth and the process is accomplished

¹ Children are defined in the DHHS regulations as “persons who have not attained the legal age for consent to treatments or procedures involved in the research, under the applicable law of the jurisdiction in which the research will be conducted.” (See 45 CFR 46.402(a).)

General Information
(continued)

- in accordance with accepted prophylactic techniques;
- i) mucosal and skin cells collected by buccal scraping or swab, skin swab, or mouth washings;
 - j) sputum collected after saline mist nebulization.
- 4) Collection of data through noninvasive procedures (not involving general anesthesia or sedation) routinely employed in clinical practice, excluding procedures involving x-rays or microwaves. Where medical devices are employed, they must be cleared/approved for marketing. (Studies intended to evaluate the safety and effectiveness of the medical device are not generally eligible for expedited review, including studies of cleared medical devices for new indications.) Examples are as follows:
- a) physical sensors that are applied either to the surface of the body or at a distance and do not involve input of significant amounts of energy into the subject or an invasion of the subject's privacy;
 - b) weighing or testing sensory acuity;
 - c) magnetic resonance imaging;
 - d) electrocardiography, electroencephalography, thermography, detection of naturally occurring radioactivity, electroretinography, ultrasound, diagnostic infrared imaging, doppler blood flow, and echocardiography;
 - e) moderate exercise, muscular strength testing, body composition assessment, and flexibility testing where appropriate given the age, weight, and health of the individual.

General Information
(continued)

- 5) Research involving materials (e.g., data, documents, records, or specimens) that have been collected, or will be collected solely for nonresearch purposes (such as medical treatment or diagnoses). (**Note:** Some research in this category may be exempt from the DHHS regulations for the protection of human subjects. See 45 CFR 46.101(b)(4). This listing refers only to research that is not exempt.)
- 6) Collection of data from voice, video, digital, or image recordings made for research purposes.
- 7) Research on individual or group characteristics or behavior (including, but not limited to, research on perception, cognition, motivation, identity, language, communication, cultural beliefs or practices, and social behavior) or research employing survey, interview, oral history, focus group, program evaluation, human factors evaluation, or quality assurance methodologies. (**Note:** Some research in this category may be exempt from the DHHS regulations for the protection of human subjects. See 45 CFR 46.101(b)(2) and (b)(3). This listing refers only to research that is not exempt.)
- 8) Continuing review of research previously approved by the convened IRB, as follows:
 - a) where (i) the research is permanently closed to the enrollment of new subjects; (ii) all subjects have completed all research-related interventions; and (iii) the research remains active only for long-term follow-up of subjects; or
 - b) where no subjects have been enrolled and no additional risks have been identified; or
 - c) where the remaining research activities are limited to data analysis.
- 9) Continuing review of research, not conducted under an investigational new drug application or investigational device exemption where categories

General Information
(continued)

two (2) through eight (8) do not apply but the IRB has determined and documented at a convened meeting that the research involves no greater than minimal risk and no additional risks have been identified.

CANCELLATION:

Not applicable (N/A)

INQUIRIES:

Office of Sponsored Projects (OSP)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue.

RESPONSIBLE CONDUCT OF RESEARCH TRAINING

Purpose	1
Definitions	1
Applicability	2
Responsibilities	3
Special Requirements	4
References	5

Purpose

The Smithsonian Institution is committed to the ethical conduct of research that develops the many scholarly fields across the Institution, and prepares current and future generations for scholarly studies in the national research community. To that end, the Smithsonian must ensure that designated staff members are aware of and receive federally mandated training in the Responsible Conduct of Research (RCR).

The purpose of this directive is to ensure that all Smithsonian staff, Fellows, volunteers, research associates and other honorary appointees (“Smithsonian staff”) currently participating in research activities funded by the National Science Foundation (NSF), National Institutes of Health (NIH) or Public Health Service (PHS) are familiar and comply with the federal regulations in RCR, and that the Smithsonian meets all requirements to ensure the Institution’s continued eligibility to receive federal grants and contracts.

Definitions

RCR can be defined as:

The practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related

Definitions
(continued)

to the conduct of research in the sciences, arts and humanities.

RCR training includes the following components that should be considered throughout the entire research process:

- Integrity;
- SD 103, Standards of Conduct: Conflict of Interest (whether personal, professional, or financial);
- SD 205, Research Associates;
- SD 208, Ethical Standards for Smithsonian Institution Volunteers;
- SD 606, Research Involving Human Subjects: Human subjects policy;
- SD 605, Animal Care and Use: Animal welfare policy;
- Safe laboratory practices;
- Mentor/mentee responsibilities and relationships;
- Collaborative science;
- SD 204, Evaluation Guidelines for Professional Accomplishments: Peer review;
- Data management;
- SD 604, Misconduct in Research: Methods for handling research misconduct; and
- Responsible authorship and publication.

Applicability

This directive applies to all individuals within the Institution who are currently conducting and participating in research activities funded by NSF, NIH, or PHS. All other Smithsonian staff conducting research

Applicability
(continued)

are encouraged to complete RCR online training established by the Office of the Under Secretary for Science, which is available through the Office of Sponsored Projects (OSP) Prism website at <http://prism.si.edu/osp/>.

For those working on sponsored projects, the following individuals must complete online training and provide documentation of their training to the OSP:

- All Principal Investigators (PIs) who receive a first-time NSF, PHS, or NIH grant award
- All students, interns, or postdoctoral scholars participating in the research of an NSF-, PHS-, or NIH-funded project
- Principal Investigators who have received NSF, PHS, or NIH awards in the past and need to complete a one-time certification of their understanding of RCR upon receipt of an NSF, PHS, or NIH award

Documentation of RCR training is only required once as a Smithsonian employee or associated staff member (unless a sponsor specifies otherwise). It is expected that ongoing discussions and periodic refresher training at different stages of an individual's career would be appropriate and necessary.

Responsibilities

The ***Under Secretary for Science, Under Secretary for History, Art, and Culture, Deputy Under Secretary for Collections and Interdisciplinary Support, and Assistant Secretary for Education and Access*** are responsible for implementing all RCR policies and ensuring the availability of all necessary RCR training resources for Smithsonian staff. Training resources can be found through the OSP internal webpage.

Unit Directors are responsible for ensuring that the appropriate individuals within their unit conduct training,

Responsibilities
(continued)

and should encourage ongoing face-to-face discussion of RCR issues.

Principal Investigators (PIs) for NSF-, PHS-, and NIH-funded awards are responsible for ensuring that all students, interns and postdoctoral scholars who are members of the research project are aware of and participate in necessary training, and that all RCR training is documented and provided to OSP for each individual working on the project.

In addition, PIs must document their own understanding of RCR, as outlined under the “Applicability” section above.

Smithsonian staff who conduct basic research activities in history, art and culture or the sciences, and which is funded by NSF, NIH, or PHS, are responsible for becoming familiar with and abiding by the applicable Smithsonian Directives.

OSP and the Smithsonian Astrophysical Observatory (SAO) will maintain records of completed RCR training, managed by SAO’s sponsored projects office, which independently manages SAO’s grant and contract activity.

**Special
Requirements**

National Science Foundation (NSF): The NSF requires that implementation of RCR training in the American COMPETES Act, under Section 7009, is enforced for all research funded through the NSF. For further guidance on NSF requirements, refer to http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_4.jsp.

Public Health Service (PHS) and National Institutes of Health (NIH) grants: All grants awarded in collaboration with PHS and NIH must include a plan for training in RCR. For further guidance on PHS and NIH requirements, refer to:

- NIH website at <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html>

**Special
Requirements**
(continued)

- PHS website at http://ori.hhs.gov/documents/FR_Doc_05-9643.shtml
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References

Additional information on various aspects of RCR may be viewed at the following websites:

- <http://prism2.si.edu/DocumentsForms/Pages/SDs.aspx>
- *Lab Safety Manual* information:
http://ofeo.si.edu/safety_health/emdhome.asp
- NIH RCR information:
<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html>
- Smithsonian Institution Statement of Values and Code of Ethics (Ethics Advisory Board):
<http://prism.si.edu/ogc/Ethics/OGCEthicsPage.html>
- National Institutes of Health, Notice Number NOT-OD-10-019, dated November 24, 2009
- NSF RCR information:
http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_4.jsp
- PHS RCR information:
http://ori.hhs.gov/documents/FR_Doc_05-9643.shtml
- SD 103, Standards of Conduct:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20103.pdf>
- SD 204, Evaluation Guidelines for Professional Accomplishments:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20204.pdf>
- SD 205, Research Associates:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20205.pdf>
- SD 208, Ethical Standards for Smithsonian Institution Volunteers:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20208.pdf>
- SD 604, Misconduct in Research:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20604.pdf>

References
(continued)

- SD 605, Animal Care and Use:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20605.pdf>
 - SD 606, Research Involving Human Subjects:
<http://prism2.si.edu/SIOrganization/OCFO/OPMB/SD/SD%20606.pdf>
-

CANCELLATION:

None

INQUIRIES:

Office of Sponsored Projects (OSP)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 608,

July 3, 2012

**FINANCIAL CONFLICT OF INTEREST
FOR NSF-, NIH-, AND PHS-SPONSORED PROJECTS**

Purpose	1
Background	1
Applicability	2
Policy	2
Definitions	3
Responsibilities	6
Enforcement and Sanctions	8
References	9

Purpose

The purpose of this Smithsonian Directive (SD) is to ensure that all individuals affiliated with the Smithsonian, currently participating in research activities funded by the National Institutes of Health (NIH), National Science Foundation (NSF), or Public Health Service (PHS includes NIH, the Centers for Disease Control and Prevention, and other agencies), are familiar and comply with the federal regulations on Objectivity in Research, and that the Smithsonian meets all requirements to ensure the Institution's continued eligibility to receive grants and contracts from these agencies. Failure to comply with this SD can jeopardize continued or future funding from NIH, NSF, or PHS.

Background

The NIH, NSF, and PHS have issued regulations on Financial Conflict of Interest (FCOI) as related to research funded by these agencies.

The Smithsonian Institution (SI) recognizes that scholars and other staff engage in many relationships with outside entities, some of which might create a financial conflict of interest, or the appearance of a conflict of interest. These conflicts are increasingly common and sometimes unavoidable in a modern research setting. For example, an investigator, through federal grants, may develop a methodology which could be commercialized in the private sector.

Background
(continued)

If the investigator has a financial interest in a small business in order to bring such a methodology to market, the relationship between the individual and the small business could be the source of potential conflicts of interest.

The Smithsonian Institution, therefore, recognizes its obligation to ensure that research and other scholarly activities are carried out under the highest standards of integrity and ethical conduct. This policy serves to protect the interests of the scholarly community of the Smithsonian by advancing an important goal: defense of the integrity and objectivity of the research carried out by our researchers.

This SD describes a disclosure process separate from the procedures in SD 103, Smithsonian Institution Standards of Conduct. Investigators who are required to make a disclosure under this directive may or may not also be required to disclose financial interests on SI Form 1085, under SD 103 procedures. Individuals may consult with their unit directors or the Office of Sponsored Projects (OSP) for more information.

Applicability

This directive applies to all Smithsonian employees and affiliated staff*, regardless of title, who are responsible for the design, conduct or reporting of research activities funded by NIH, NSF, or PHS through an award to the Smithsonian, or through a subaward from another institution that has been funded directly by NIH, NSF, or PHS.

Policy

The Smithsonian Institution shall adhere to the standards and procedures set forth in this directive in monitoring significant financial interests and managing disclosed financial conflicts of interest for investigators

* Affiliated staff means individuals other than employees who perform duties for the Smithsonian or who operate on Smithsonian property, including but not limited to contractors, volunteers, interns and Fellows, Friends of the National Zoo employees, visiting researchers and students, research associates and collaborators, and Smithsonian Associates (TSA) educators.

Policy (continued)

who propose or receive funding from the NIH, the NSF or the PHS, in order to comply with federal regulations.

Definitions

An **Investigator** is the project director (PD), principal investigator (PI) or co-principal investigator (co-PI), or other person, regardless of title, who is responsible for the design, conduct, or reporting of research funded by the NIH, NSF, or PHS, or in proposals for such funding. For the purposes of this policy, the financial interests of the investigator include the financial interests of his or her spouse and dependent children, according to NIH, NSF, and PHS requirements.

Institutional responsibilities are an investigator's professional responsibilities on behalf of the Smithsonian Institution, which may include activities such as research, research consultation, professional practice, Smithsonian committee memberships, and/or service on panels such as the Institutional Review Board of Animal Care and Use Committee.

A **Significant Financial Interest (SFI)** is defined at 42 *Code of Federal Regulations* (CFR) 50.603 as:

- (1) A financial interest consisting of one or more of the following interests of the investigator (and those of the investigator's spouse and dependent children) that reasonably appears to be related to the investigator's institutional responsibilities:
 - (i) With regard to any publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. Remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value

Definitions
(continued)

- (ii) With regard to any non-publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure, when aggregated, exceeds \$5,000, or when the investigator (or the investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
 - (iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
- (2) The occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; however, this disclosure requirement does not apply to travel that is reimbursed or sponsored by a government agency (federal, state, or local), an institution of higher education, or its affiliated entities, such as an academic teaching hospital, medical center, or research institute. (See SD 103, §11 regarding the approval process for reimbursed travel.)
- (3) An SFI does not include the following:
 - (i) Salary, royalties, or other remuneration paid by the Institution, including intellectual property rights and agreements to share in royalties related to such rights;
 - (ii) Income from investment vehicles, such as mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions made in these vehicles;
 - (iii) Income from seminars, lectures, or teaching engagements sponsored by a government agency or institution of higher education; or

Definitions
(continued)

- (iv) Income from service on advisory committees or review panels for a government agency or institution of higher education.

A **Financial Conflict of Interest (FCOI)** is said to exist if a significant financial interest could directly and significantly affect the design, conduct, or reporting of NIH-, NSF-, or PHS-funded research.

Managing a financial conflict of interest means taking action to address an FCOI, which can include reducing or eliminating the FCOI to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.

Examples of conditions or restrictions that might be imposed to manage an FCOI include, but are not limited to: public disclosure of FCOI (e.g., when presenting or publishing the research); disclosure of FCOI directly to human subject participants; appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the FCOI; modification of the research plan; change of personnel or personnel responsibilities; reduction or elimination of the financial interest (e.g., sale of an equity interest); and severance of relationships that create financial conflicts.

Any actual financial conflicts of interest will be managed by consultation with an *ad hoc* FCOI committee and the development of a management plan for the conflict. The *ad hoc* committee will consist of at least three persons, and may include a researcher from the investigator's unit, a representative from the Office of General Counsel (OGC), a representative from OSP, or representatives of other areas as may be appropriate to ensure balanced representation of disciplines and interests. FCOI management plans will include a description of how the SFI is related to NIH-, NSF-, or PHS-funded research and will specify the actions that have been and will be taken to manage such FCOI.

Responsibilities

The Under Secretary for Science, the Under Secretary for History, Art and Culture, the Deputy Under Secretary for Collections and Interdisciplinary Support, and the Assistant Secretary for Education and Access are responsible for implementing FCOI policies and ensuring the availability of necessary FCOI training resources for Smithsonian staff. If a potential financial conflict is disclosed, the appropriate Under Secretary, Deputy, or Assistant Secretary will convene an *ad hoc* financial conflict of interest committee to review the matter and to develop a management plan for the conflict.

Unit Directors are responsible for ensuring that the appropriate individuals within their unit submit disclosures of significant financial interests and complete periodic training in FCOI, if they are investigators funded by NIH, NSF, or PHS. If a potential financial conflict is disclosed, the unit director or designee will assist the appropriate Under Secretary, Deputy, or Assistant Secretary in the convening of an *ad hoc* committee to review the matter and to develop a management plan for the conflict.

Investigators (PIs, co-PIs) who conduct basic research activities in history, art, and culture or the sciences, through NIH-, NSF-, and PHS-funded awards, are responsible for ensuring that they make disclosures at the following times:

- a) when they submit a proposal for funding;
- b) when they receive an award;
- c) annually during the term of the award; and
- d) within 30 days of discovering or acquiring a new significant financial interest

Investigators will complete training prior to engaging in research related to any NIH-, NSF-, or PHS-funded grant and at least every four years thereafter. Investigators who bring an NIH, NSF, or PHS grant with them to the Institution as new employees will complete

Responsibilities
(continued)

training within 30 days upon being hired. Investigators will complete new training whenever this SD or related procedures are revised. If a conflict is found to exist, investigators are responsible for complying with the terms of an institutional FCOI management plan. Investigators will complete additional training whenever the investigator is found not to be in compliance with either this SD or a management plan created to manage a disclosed FCOI.

The Office of Sponsored Projects (OSP) will:

- provide training in financial conflict of interest to members of the SI community and will inform all investigators of their responsibility to complete training on this SD, their obligation to disclose SFIs, and of the content of NIH, NSF, and PHS regulations regarding financial conflict of interest.
- maintain records of the disclosure process for non-Smithsonian Astrophysical Observatory (SAO) investigators applying to, and all SI investigators receiving awards from, NIH, NSF, or PHS.
- ensure that the Director of OSP reviews disclosures from all Smithsonian investigators within 60 days and will determine whether any SFI is related to NIH-, NSF-, or PHS-funded research. In addition, in the event of a potential conflict of interest, OSP will confer with the appropriate Under Secretary, Deputy, or Assistant Secretary to convene an *ad hoc* committee to review the case and implement a management plan that shall specify the actions that have been and will be taken to manage such FCOI.
- prior to the expenditure of any funds under an NIH-, NSF-, or PHS-funded research project, provide to the appropriate funding agency an FCOI report regarding any investigator's SFI found by the Institution to be a conflict of interest and ensure that the Smithsonian Institution has implemented a management plan in accordance with NIH, NSF, or PHS regulations. OSP will provide to the appropriate

Responsibilities
(continued)

funding agency, within 60 days of the disclosure, a revised FCOI report if any new SFIs are identified subsequent to the initial report and ensure that the Smithsonian Institution has implemented a management plan.

- maintain a publicly accessible website to report on the existence and management of any financial conflicts of interest, in accordance with 42 CFR Part 50 and 45 CFR Part 94. The information will be updated as described by NIH, NSF, and PHS regulations, at least annually, or within 60 days of identification of information that was not previously disclosed.

The ***Smithsonian Astrophysical Observatory (SAO)*** Administration will:

- inform all SAO investigators of their responsibility to complete training in financial conflict of interest and this SD, their obligation to disclose SFIs, and of the content of NIH, NSF, and PHS regulations regarding financial conflict of interest.
- maintain records of the disclosure process for SAO investigators proposing to NIH, NSF, or PHS.
- notify OSP of all NIH, NSF, and PHS awards received by SAO investigators. Should a conflict of interest be disclosed for an SAO investigator, SAO Administration will confer with the Under Secretary for Science and OSP to convene an *ad hoc* committee to review the case and implement a management plan that shall specify the actions that have been, and will be, taken to manage such FCOI.

**Enforcement
and Sanctions**

Smithsonian employees can be subject to the disciplinary process of the Institution if they fail to fully and truthfully disclose financial conflict of interest situations or fail to comply with any stipulated plan for managing the disclosed conflict.

References

- Public Health Service Policy Promoting Objectivity in Research:

<http://grants.nih.gov/grants/policy/coi/> and
<http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf>

- National Science Foundation Investigator Financial Disclosure Policy:

<http://www.nsf.gov/pubs/stis1996/iin117/iin117.txt>

- Smithsonian Institution's *Guide to Sponsored Projects*:

http://prism.si.edu/osp/PIGuide/pi_guide.htm

- SD 103, Smithsonian Institution Standards of Conduct
- SD 312, Travel, and associated *Travel Handbook*
- SD 102, Disclosing, Protecting, and Commercializing Inventions, and
- SD 609, Digital Asset Access and Use

All SDs are available on the Prism Directives homepage

CANCELLATION:

None.

INQUIRIES:

Office of Sponsored Projects (OSP)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue

DIGITAL ASSET ACCESS AND USE

I.	Purpose	1
II.	Background	1
III.	Scope	2
IV.	Roles and Responsibilities	2
V.	Definitions	5
VI.	Access and Use Policy	9
VII.	Allowable Restriction Categories	14
VIII.	Public Domain Materials	19
IX.	Allowable Fees	20
	Appendix A, Internal Tracking Form for Denial of Digital Asset Requests	
	Appendix B, Common Vocabulary Rights Usage Glossary	

I. Purpose

This directive describes the policy for access to and use of the Smithsonian's digital assets by Smithsonian and non-Smithsonian entities, specifies the criteria for use, including circumstances when restrictions on access and use may be imposed, and when it is appropriate to charge fees.

II. Background

Digital assets held by the Smithsonian are rapidly increasing both in quantity and type, and will continue to expand significantly as the Institution implements its Digitization Strategic Plan. At the same time, public demand for access to the Smithsonian's digital assets continues to increase.

Digital assets, as defined in this policy, are found in a variety of contexts throughout the Institution. They exist: (i) in the collections as works of art; (ii) as digital reproductions or "surrogates" for physical items in the collections; and (iii) as digital records generated as a result of research by the Smithsonian and its units. The Smithsonian maintains these digital assets to advance

II. Background (continued)

the Smithsonian's mission to increase and diffuse knowledge, support the Institution's strategic goals, and facilitate access to the public for scholarly, educational, and personal use.

The commitment to share digital assets must be balanced against the Smithsonian's stewardship, management and preservation responsibilities. These obligations must take into consideration a wide range of legal, ethical and practical factors, and also reflect the staff and financial resources required to generate, maintain and render digital assets publicly accessible. Such considerations often dictate the need for access and use restrictions and the need to assess fees.

III. Scope

This directive applies to all digital assets held by the Smithsonian Institution except records of the Institution, as defined by SD 807, Requests for Smithsonian Institution Information.¹ It also does not apply to digital assets of Smithsonian affiliated agencies collocated at the Smithsonian unless ownership is transferred to, or shared with, the Smithsonian. Collections that are digital are included in the scope of this policy and also covered by SD 600, Collections Management, which specifies policy for use and sharing of collection items. In the event of any conflicts between the policies, SD 600 shall govern. Questions about collections that are digital can be directed to the National Collections Program in the Office of the Deputy Under Secretary for Collections and Interdisciplinary Support.

IV. Roles and Responsibilities

The **Secretary** is responsible for establishing institutional goals to facilitate access to and use of the Institution's digital assets for scholarly, research and educational purposes, and for overseeing the application and enforcement of this policy, but may delegate responsibility to implement the direct management, oversight, and record keeping pertaining to digital assets.

¹ SD 807 defines records as email, contracts, employee records, donor, vendor and lender records, and other information created, stored, or maintained by the Smithsonian in the course of conducting its business.

IV. Roles and Responsibilities
(continued)

The **Under Secretaries** are responsible for ensuring that access to and use of digital assets are carried out in compliance with this policy through oversight by unit directors, and for hearing appeals of decisions by holding unit directors to deny requests for access and use.

The **Deputy Under Secretary for Collections and Interdisciplinary Support** and the **National Collections Program (NCP)** are responsible for improving the stewardship and management of Smithsonian collections by providing central leadership and policy oversight of Institution-wide collections initiatives, including the administration and implementation of SD 600, Collections Management, and the review and approval of collecting unit collections management policies. The NCP is responsible for coordinating with the Digitization Program Office collections management policies that may affect implementation of the requirements set forth in this directive for collections that are digital.

The **Office of the Chief Information Officer (OCIO)** is responsible for designing, implementing and maintaining the information technology (IT) infrastructure and systems to facilitate the sharing, use and accessibility of Smithsonian digital assets within and outside the Smithsonian in accordance with this policy.

The **Digitization Program Office (DPO)**, which operates under the OCIO, is responsible for improving the overall stewardship and long-term management of the Smithsonian's digital assets by providing central leadership and policy oversight of the Institution-wide digitization program. The DPO develops and maintains pan-Institutional digitization directives, and aggregates and reports statistics regarding unit responses to requests for access and use of digital assets.

The **Office of Communications and External Affairs (OCEA)** maintains the Institution's public-facing website through which the public gains access to digital assets, posts the terms and conditions for the use of digital

IV. Roles and Responsibilities
(continued)

assets on the website consistent with this policy, provides updates to such terms and conditions of use in consultation with the Office of General Counsel (OGC), and maintains and posts on the website a current list of unit contacts responsible for handling digital asset use requests.

The **Holding Unit Directors** oversee the implementation of this policy, ensuring compliance by the holding unit's staff. This includes defining which restriction categories are applicable to the digital assets maintained by the holding unit, and resolving disputes with respect to requests for access and use. The holding unit directors also designate contacts within their respective holding units to handle requests to use digital assets, notify OCEA of the contacts, and update contact information as appropriate.

Holding Unit Staff is responsible for responding to requests in a timely manner, evaluating the incoming requests for access and use, determining whether an Allowable Restriction Category applies to the requested digital asset, documenting the decision to grant or deny access, tracking the basis for denials, completing required licensing forms, and retaining records of decisions in accordance with applicable records retention policies. Holding unit staff is also responsible for providing statistical information to the DPO in a timely manner, upon request, regarding the number of requests granted and denied.

Requesting Unit Staff will abide by the restrictions regarding access and use of digital assets consistent with restrictions specified by the holding unit.

The **Office of General Counsel** (OGC) provides legal advice to the holding unit in connection with questions concerning allowable restriction categories and in determining whether commercial use requests are consistent with existing legal obligations, in consultation with Smithsonian Enterprises. Standard and custom licensing agreements are developed in coordination with the OCon&PPM.

IV. Roles and Responsibilities (continued)

The **Office of Contracting and Personal Property Management (OCon&PPM)** assists the holding units in preparing, drafting, negotiating and executing contracts and licenses to third parties for the use of digital assets in accordance with SD 314, Contracting. OCon&PPM also pre-approves unit-specific digital image licensing forms. Standard and custom licensing agreements are developed in coordination with the OGC.

Smithsonian Enterprises is consulted when the Institution receives non-routine requests for commercial use of digital assets, enters into revenue-sharing agreements with the holding units in connection with the commercial use of digital assets as appropriate, and assists the holding units, OGC, and OCon&PPM in evaluating whether requests to use digital assets for commercial purposes are consistent with existing contractual obligations and other projects using the Smithsonian brand to generate revenue for the Institution.

V. Definitions

A. General

- *Digital assets* include text, still images, moving images and sound recordings, research datasets and other types of media originally created in digital format (i.e., born digital) or digitized from another format or state (i.e., a digital surrogate) that are created, stored, or maintained by the Smithsonian. For the purpose of this directive, digital assets also include metadata (also known as cataloguing and collections information) used to describe the digital asset and its content. Digital assets, for purposes of this policy, may be collection objects (e.g., digital art), reproductions of collection items, or content generated in digital form as a result of the research and programmatic activities.
- *Intranet* is an environment where digital assets are shared internally at the Smithsonian via the Smithsonian network (SInet).

V. Definitions (continued)

- *Internet* is an environment where digital assets are shared externally with the public via World Wide Web applications.
- *Metadata* is the information used to describe a digital asset. Generally, metadata is grouped into three categories:
 - administrative (e.g., date/time of scan, restrictions attached to the digital asset itself, such as copyright, and the unit that retains the original);
 - descriptive (e.g., subject, location, title, date of item, dimensions, restrictions attached to the underlying content of the digital asset); and
 - technical (e.g., specification of the digital asset and digitization equipment).

B. Access Terms

- *Unit*: A Smithsonian museum, research center, or office, including all subordinate organizations.
- *Holding Unit*: The Smithsonian unit responsible for approving access to and use of digital assets under its delegated management responsibilities and in accordance with its digital asset management plan. The holding unit is not the Office of the Chief Information Officer, which is the unit that manages the systems that store or provide technological access to the digital asset or the unit which aggregates content from other Smithsonian units.
- *Publicly Accessible*: A digital asset is publicly accessible if it is available on a Smithsonian or Smithsonian-sponsored or hosted website, or if it appears in a Smithsonian digital publication (e.g., DVD).
- *Requesting Unit*: The unit that wishes to use a digital asset for internal use or external dissemination.

V. Definitions (continued)

- *Smithsonian Entity*: Smithsonian unit, employees, Smithsonian-based employees of affiliated agencies (e.g., U.S. Geological Survey), volunteers registered with the Smithsonian, interns, Fellows and research associates, who are (a) acting within the scope of official Smithsonian business; or (b) in the case of Smithsonian-based employees of affiliated agencies, volunteers, interns, Fellows and research associates, seeking access to a digital asset for an official Smithsonian purpose. For these purposes, contractors are not considered Smithsonian entities.
- *Non-Smithsonian Entity*: A person, corporation, or non-profit or organization other than a Smithsonian entity.

C. Use Terms

- *Fair Use*: Fair use is a legal concept under United States copyright law that allows the reproduction and use of copyrighted material for certain educational purposes such as news, commentary, and teaching, without obtaining permission from the copyright owner. Fair use is a legal defense to a claim of copyright infringement and is based on a four-part test which takes into consideration the purpose and character of the use, the nature of the copied work, the amount and substantiality used in relation to the whole, and the effect of the use on the market for the original. In addition to the fair use categories of news, commentary, and teaching, other uses may satisfy the requirements for fair use if such use is transformative; the new use must use the original in a way that adds and enhances its value rather than as a mere copy or derivative.
- *Internal Use*: Any use of a Smithsonian digital asset by a Smithsonian entity that is purely within the Smithsonian and for on-site usage (e.g., research on the Smithsonian's intranet),

V. Definitions
(continued)

and is not disseminated externally through the Internet, publication, or other distribution.

- *Non-commercial Use:* Use of a Smithsonian digital asset by a Smithsonian entity for standard Smithsonian uses (including exhibition, education, research, public programming, archival uses, and fund raising) or by a non-Smithsonian entity solely for the purpose of educational, scholarly, or personal use, provided that the digital asset and any product into which it is incorporated is not marketed, promoted or sold.²
- *Commercial Use:* Any use of a Smithsonian digital asset in which the asset is marketed, promoted and/or sold, or is incorporated into a product or publication, or media-form that is marketed, promoted and/or sold (“Product”).

Examples include, but are not limited to consumer merchandise (whether produced by the Smithsonian Institution or by a non-Smithsonian entity), periodicals, trade publications, scholarly journals with paid subscriptions, television programs, feature films, advertisements, websites with paid advertising, and cause-related marketing. For purposes of this policy, educational and scholarly uses of digital assets are considered a commercial use if the resulting Product is marketed, promoted and/or sold, even if the fees paid by the requesting party are intended solely to cover the holding unit’s actual costs of making the digital asset available.

- *Public Domain:* The public domain is an intellectual property designation that describes the copyright status of original content (e.g., text, images, audio, video). Content falls into the public domain after a specified period of copyright protection expires or if the content is

² Use of digital assets may be deemed non-commercial use for purposes of this policy, but such uses may not necessarily constitute a “fair use” under copyright law. The determination of fair use must be made on a case-by-case basis, in consultation with the OGC as needed.

V. Definitions
(continued)

not eligible for copyright protection in the first instance, such as work created by a federal employee within the scope of his or her official duties, or when an author affirmatively places creative works into the public domain.

VI. Access and Use Policy

Holding units will provide access to, and use of, digital assets for non-commercial use by Smithsonian entities and non-Smithsonian entities subject to allowable restriction categories in Section VII of this policy and for commercial use by Smithsonian entities and non-Smithsonian entities as specified below in (C) and (D). Holding units are encouraged to make digital assets available at the best quality (e.g., size and resolution) that is appropriate for the requested use, but decisions about quality such as size, format, resolution and other similar technical details are at the sole discretion of the holding unit.

A. Internal Use

Holding units will make their existing digital assets available without fee to other Smithsonian entities for internal access and use, unless doing so would violate one of the allowable restriction categories in Section VII of this policy, and the denial is documented in writing (e.g., Appendix A, the Internal Tracking Form for Denial of Digital Asset Requests, or equivalent electronic means). If a holding unit does not have the requested asset in digital form, it may generate the digital asset and charge the Smithsonian entity the cost of generating such asset.

Internal use is limited to use solely within the Smithsonian and is not intended for external dissemination outside of the Smithsonian.

B. External Non-Commercial Use

When a request is submitted for an external non-commercial use of a digital asset, the request will be granted by the holding unit unless doing so would violate one of the allowable restriction categories set forth in Section VII of this policy. The procedure for

**VI. Access and Use
Policy** (continued)

handling the non-commercial use request as set forth below applies regardless of whether it is made by a Smithsonian or non-Smithsonian entity. However, the procedure will vary depending on whether or not the digital asset is already publicly accessible at the time of the request. If requests for external non-commercial use are declined by the holding unit, the reason must be based on the nature of the use and not the user, and the basis must correspond to an allowable restriction category as set forth in Section VII. Requests shall be handled as follows:

1. *Digital asset is publicly accessible.* Non-commercial external uses do not require a written request and are automatically approved if the holding unit has already made the requested digital asset publicly accessible, and the proposed use meets the following criteria: a) use complies with the stated restrictions associated with the digital asset as specified by the holding unit; b) use complies with the Terms of Use posted on the Smithsonian website; c) use does not modify the asset or related metadata; and d) the digital asset is displayed with attribution and a link to the holding unit. If a requester submits a request and the holding unit determines that such request satisfies the criteria above, the holding unit may confirm to the requester that such non-commercial use is permitted automatically.
2. *Digital asset is not publicly accessible or does not meet the above criteria.* If the holding unit has not made a digital asset publicly accessible or the asset is not available at the desired quality or the proposed use is not consistent with the above criteria, the requester must submit a written request to the holding unit, specifying the intended use and any proposed modifications to the digital asset or metadata. If the proposed use is commercial, see subsections C and D below. For non-commercial external uses, the following procedures apply:

**VI. Access and Use
Policy** (continued)

- a. The holding unit should acknowledge the request within 10 business days and notify the requester when a response will be provided.
- b. If the holding unit approves the use, it should document the approval and either (i) prepare a written agreement using a licensing form pre-approved by OCon&PPM or OGC, with the requesting party for the specific non-commercial use, or (ii) contact OCon&PPM or OGC to prepare a custom license agreement. If the holding unit elects to use a pre-approved form, any deviations must be approved by OCon&PPM or OGC. A sample Digital Asset Request and Usage Form is provided at <http://prism.si.edu/ogc/> (Forms).
- c. If the use is denied, the holding unit should notify the requester, document the denial and specify the basis for denial on Appendix A, or by other method (e.g., electronic). If the use is denied, the decision may be appealed to the unit director or, in the case of a decision to deny that is made by a unit director, to an appropriate Under Secretary. The holding unit shall maintain records of all denials on Appendix A or by other method in accordance with applicable records retention policies.

C. Internal Requests for Commercial Use

If a Smithsonian entity wants to use digital assets for a commercial product branded with the Smithsonian name or logo, or consisting predominantly of Smithsonian digital assets, and the proposed use does not interfere with the holding unit's plans for the digital assets, the holding units may grant the request provided that (a) the use of digital assets is consistent with any allowable restrictions set forth in Section VII; and, if the requesting Smithsonian entity is other than Smithsonian Enterprises (SE) (b) the requesting Smithsonian entity contacts SE to ensure that such branded commercial uses will not interfere or conflict

**VI. Access and Use
Policy** (continued)

with existing contracts or other commercial obligations of the Institution, using the criteria set forth in paragraph (D)(6) below.

If a conflict exists, the digital asset may not be used for commercial purposes until any such conflict is resolved. If the holding unit and requesting unit disagree as to whether a conflict exists, the matter will be resolved by the directors of the respective units. If the directors are unable to reach agreement, the matter may be referred to the appropriate Under Secretary.

If no conflict exists, the requesting unit and the holding unit will work together to reach a mutually acceptable agreement for access and use of the digital asset, including but not limited to provisions for reimbursing the holding unit for the cost of generating the digital asset, if it does not already exist, and any other conditions of use. If the requesting unit is SE, the holding unit and SE will share revenue in accordance with the revenue-sharing guidelines established by the Institution.

If the requesting and holding units reach agreement on commercial use of digital assets and the requesting unit will be making the digital asset available to a third party, the requesting unit may either contact the Office of Product Development and Licensing in SE to prepare a one-time commercial license or contact OCon&PPM to prepare a written, one-time license agreement. If the requesting unit and holding unit are unable to reach agreement, the directors or the requesting and holding units will attempt to resolve the matter. If the directors are unable to reach agreement, the matter may be referred to the appropriate Under Secretary.

D. External Requests for Commercial Use

The decision to grant or deny a request from a non-Smithsonian entity for a commercial use of a digital asset is at the sole discretion of the holding unit, subject to the policies and procedures herein. Requests shall be handled as follows:

**VI. Access and Use
Policy** (continued)

1. Requests must be submitted in writing to the holding unit and must specify the proposed commercial use, and any changes to the digital asset or metadata in connection with such use.
2. The holding unit should acknowledge the request within 10 business days and notify the requester when a response will be provided.
3. If the holding unit denies the request, it must notify the requester and document the basis for the denial on Appendix A, or by other method (e.g., electronic).
4. Decisions by the holding unit to deny a commercial use of a digital asset by a non-Smithsonian entity are final and not subject to appeal, except that if the denial by the holding unit directly and adversely affects activities or obligations of another unit (e.g., commitments made to a sponsor), the affected unit may appeal to the appropriate Under Secretary.
5. If the holding unit would like to grant the request and the digital asset is not otherwise subject to an allowable restriction category, then:
 - If the request is for routine commercial licensing of digital assets in publications or other media, the holding unit may grant the request provided that it uses a written licensing form pre-approved by OCon&PPM or OGC.

For these purposes, “routine commercial licensing” means the licensing of digital assets to a third party (e.g., publisher, scholar, non-profit institution) where the third party seeks to use, reproduce or incorporate digital assets in a publication or media product (e.g., exhibition catalogue, journal article, book, CD) that is not branded with the Smithsonian name or logo and does not consist predominantly of Smithsonian digital assets.

**VI. Access and Use
Policy (continued)**

- If the external request is for non-routine commercial use of digital assets, the holding unit will first contact SE to ensure that such commercial uses will not interfere or conflict with existing contracts or other commercial obligations, according to the criteria set forth in subsection 6 below. If there is a conflict, the holding unit will work with SE to address the conflict.
 - If the request is for non-routine commercial licensing of digital assets and no conflict exists with SE, the holding unit may grant the request provided that it either uses a pre-approved written license form or contacts OCon&PPM or OGC to develop a custom license.
6. In deciding whether the external request for commercial use will interfere or conflict with the Smithsonian's own commercial and revenue-generating activities, the following factors will be considered: a) whether the quantity or prominence of Smithsonian digital assets used in the product creates the impression that it is a Smithsonian product; b) whether the proposed product will be branded as a Smithsonian product and marketed and sold using the Smithsonian trademark (name or logo); c) whether the proposed product might conflict with an existing Smithsonian project or contract; or d) whether the proposed product will violate an applicable law or legal obligation. Smithsonian Enterprises and OCon&PPM will consult with OGC as needed in making these determinations.
-

**VII. Allowable
Restriction
Categories**

For a variety of legal, ethical and policy reasons, it may be necessary at times to restrict access to and use of the Smithsonian's digital assets internally, externally or both. The most common types of restrictions are set forth below. Each director, or his or her designee, shall be responsible for determining when restrictions other than legal are mandatory, and when they may be

**VII. Allowable
Restriction
Categories**
(continued)

waived by the holding unit. When use of a digital asset is restricted, the nature of the restriction must be documented, preferably in the metadata that describes the asset or at a minimum in writing when responding to a request for use.

A. Digital Assets Subject to Legal Restrictions

Legal restrictions and the manner in which they apply to digital assets are the same as those that pertain to the use of tangible collection objects generally. Therefore, when collection objects are subject to allowable restrictions, digital surrogates of such objects may be subject to the same restrictions. Restrictions include, but are not limited to, the categories listed below. For a glossary of terms included below as Allowable Restriction Categories, see Appendix B.

1. Intellectual Property Rights:

- a. *Copyright* is an intellectual property law that protects original works of authorship fixed in a tangible medium of expression (e.g., books, artwork, music, websites, photographs, research, digital assets, etc.). Many of the works of art and other content generated and held by the Smithsonian are protected by copyright. Depending on how digital assets are created or acquired by the Smithsonian, the copyright may or may not be owned by the Smithsonian, and copyright ownership is an important factor that determines whether, and to what extent, the digital asset may be used and reproduced. For a general discussion of copyright, see SD 600, the *SD 600 Implementation Manual* on intellectual property, and the Copyright Office website, www.copyright.gov. Ideas and titles are not protected by copyright, but may be protected by other intellectual property laws.
- b. *Moral rights* are set forth as part of the copyright law in the Visual Artists Rights Act ("VARA"), and they consist of an artist's right

**VII. Allowable
Restriction
Categories**
(continued)

to protect his or her name and reputation from damage caused by intentional distortion or mutilation of his or her artistic works, and other similar protections.

- c. *Trademark* is any work, name or symbol, or device, or any combination that is adopted and used by a person or entity to identify goods or services and to distinguish them from those manufactured or sold by others. The purpose of a trademark is to indicate the source of goods or services. Titles, slogans, service marks, logos, and other symbols that identify or are capable of distinguishing goods and services are protected under trademark law. Names of museums, exhibition titles, and other names or designs may be eligible for trademark protection, either under common law principles or by federal registration with the United States Patent and Trademark Office. A trademark owner may prevent others from using the same or substantially similar word, design, symbol or title in a manner that is likely to create confusion in the mind of the public. See www.uspto.gov for more information about trademarks.
- d. *Patent* is a grant conferring the right to exclude others from making, using or selling an invention. Novel and useful processes and inventions or new designs for useful objects are governed by patent laws.
- e. *Rights of Privacy and Publicity* of persons depicted in digital assets recognize that an individual has certain personal and pecuniary interests in his or her name, voice, picture, likeness, and other identifying characteristics that may restrict uses of these attributes without the individual's consent. Privacy rights also protect individuals from being depicted in a false light or in an embarrassing situation. These rights may prevent use or

**VII. Allowable
Restriction
Categories**
(continued)

reproduction of photographs of living subjects, particularly children, without express written consent of the subjects or, in the case of minor children, their parents and/or guardians. Although privacy and publicity rights are not technically intellectual property rights, they are closely related concepts that should be considered in connection with Smithsonian activities. Certain types of privacy rights are governed by state law and common law, and not by federal law.

- f. *Personally Identifiable Information ("PII")* is information about individuals maintained by the Smithsonian, including information which can be used to distinguish or trace an individual's identity and any other information that is linked or linkable to an individual, such as medical, educational, financial or employment information. PII includes, without limitation, name, contact information, address, personal identification numbers such as Social Security numbers, credit card numbers, passwords, or other security information and personal characteristics. Disclosure of such information without consent could violate an individual's privacy rights. For a more detailed description of PII, contact the Smithsonian Privacy Officer, privacy@si.edu.
2. Contractual restrictions (e.g., deeds of gift, contracts, licenses, loan agreements);
3. Native American and Native Hawaiian human remains and objects (e.g., funerary objects, sacred objects, and items of cultural patrimony) subject to repatriation. If a collection object has been repatriated, any associated digital assets may be restricted;
4. Cultural items returned to their country of origin because of the circumstances of acquisition

**VII. Allowable
Restriction
Categories**
(continued)

- (e.g., illegally or unethically exported or acquired);
5. Rare, threatened or endangered species (e.g., locality or collector information);
 6. Images, other media, or data that reveal the location of archeological, paleontological, geological, sacred and historic sites;
 7. Uncertain provenance and export records (e.g., Holocaust-era assets);
 8. Conservation, management, inventory, valuation, and other business records not covered by this policy.

B. Digital Assets that Are Subject to Policy and Other Restrictions

Digital assets, like the underlying tangible collection objects from which they are derived, may be subject to a range of policy and other restrictions that have become generally accepted in museum and scholarly communities.

1. *Sensitive Content* is defined in different ways by members of individual communities, nations, tribes, ethnic groups, and religious denominations, but usually includes materials that relate to traditional knowledge and practices. Such materials may a) be considered the private domain of specific individuals, clans, cults or societies; b) require an appropriate level of knowledge to view and understand; c) threaten the privacy and well-being of a community when exposed or disclosed to outsiders; and/or d) give offense if inappropriately used or displayed, or when appropriated or exploited for commercial purposes.
2. *Unpublished Research Data/Resources* consist of raw data, primary research and manuscripts

**VII. Allowable
Restriction
Categories**
(continued)

(“Unpublished Research”) generated during the course of research by Smithsonian entities that may be temporarily delayed or restricted from access and use to provide an opportunity for the Smithsonian entity that generated the Unpublished Research to compile and publish the data prior to general access. The duration of these limitations varies by professional discipline.

3. *Resource Limitations* may provide the basis for a holding unit to deny a request if it does not have resources (e.g., staff, expertise or time) necessary to generate the digital asset or undertake the research to determine whether the digital asset is subject to an allowable restriction category, and the holding unit is unable to obtain reimbursement of the associated costs from the requesting entity.
4. *Commercial Use* is a restriction that may be applied at any time at the sole discretion of the holding unit in connection with requests by non-Smithsonian entities (see discussion under Section VI, Access and Use, paragraph D of this directive).

**VIII. Public Domain
Materials**

The public domain describes a category of creative works (i.e., intellectual property) that is not protected by copyright and, therefore, may be used and reproduced freely by any person or entity that obtains access to the property. Creative works fall into the public domain because a) the term of copyright protection afforded under applicable copyright law has expired; b) the works are not eligible for copyright protection in the first instance (such as works created by federal employees within the course of their official duties); or c) the works are placed affirmatively into the public domain by their authors and creators.

Although use of public domain materials is unrestricted as a matter of copyright law, the Smithsonian at times regulates access to, and use of, such works through

**VIII. Public Domain
Materials** (continued)

contracts. Until a public domain policy is developed and implemented by the Institution, holding units are encouraged to make public domain digital assets available without restrictions and without licensing fees.

IX. Allowable Fees

When the Smithsonian charges fees for the use of its digital assets, it does so to generate funds for a variety of mission-related purposes, including, but not limited to, performing collections management and digitization functions, maintaining digital assets and related metadata, recovering the actual direct and indirect costs of staff and systems used to manage and provide access to the assets and making greater amounts of digital content available to the public online and through other electronic media. Subject to the availability of resources to offset these costs, units are encouraged to provide digital assets free of charge for non-commercial uses and to publicize digital assets that are available free of charge on their websites.

In addition, the following rules apply:

- Holding units *shall not* charge access and use fees to other Smithsonian entities for existing digital assets in connection with standard museum uses, but may charge for the costs of generating new digital assets and may enter into revenue-sharing arrangements for commercial use of digital assets. (For example, see SD 324, Smithsonian Enterprises Retail Revenue Sharing, which is available on Prism, for more information in this area.)
- Holding units *may, but are not required to*, charge fees for digital assets for external use by non-Smithsonian entities. Such fees may include, but are not necessarily limited to, fees to cover the costs of generating new digital assets and/or licensing fees for reproduction and use of digital assets.

CANCELLATION:
INQUIRIES:
RETENTION:

Not applicable
The Digitization Program Office in OCIO for the Office of the Secretary (OS)
Indefinite. Subject to review for currency 24 months from date of issue



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 609,
Appendix A

July 15, 2011

**INTERNAL TRACKING FORM
FOR DIGITAL ASSET COMMERCIAL USES AND DENIALS**

Use this form to track your compliance with Smithsonian Directive 609 (Digital Asset Access and Use) provisions regarding commercial use requests and any denials of requests to use digital assets. Attach the completed form to a copy of the original request and retain according to your unit's document retention and archiving schedules.

Identify Request Tracked on this Form

Name of Requester:	Title of Intended Use:	Asset(s) Requested:
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For Commercial Uses Only

SD 609 Section VI.D.3 requires (i) advance consultation with Smithsonian Enterprises and the Office of General Counsel (OGC) for certain types of Commercial Requests and (ii) Office of Contracting and Personal Property Management (OCon&PPM) approval of the Digital Asset Request and Usage Form. DOCUMENT COMPLETION OF THESE STEPS BELOW.

Smithsonian Enterprises/OGC Consultation	OCon&PPM Approval
Name:	Name:
Date:	Date:

For Denied Requests Only

SD 609 permits the Smithsonian to deny a request only if an allowable restriction category applies. MARK YOUR INITIALS UNDER THE APPLICABLE ALLOWABLE RESTRICTION CATEGORY BELOW. If you are uncertain about the existence or applicability of restrictions, contact the Office of General Counsel.

Restricted by Copyright	Restricted by Moral Rights	Restricted by Trademark
Restricted by Patent	Restricted by Privacy or Publicity Rights	Restricted by Contract
Restricted by Native American Repatriation	Restricted by Cultural Repatriation	Restricted to Protect Species
Restricted Physical Access	Restricted as Sensitive Content	Restricted as Unpublished Research
Restricted by Resource Limitations	Restricted by Commercial Use	

REMINDER: Requests for use of Smithsonian assets or premises in film, television or video must be made via <http://newsdesk.si.edu/filming-application-form>. Units may not grant filming requests without prior approval from the unit public information officer and, as applicable, the central film committee.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 609,
Appendix B

July 15, 2011

COMMON VOCABULARY RIGHTS USAGE GLOSSARY

The Smithsonian unit that holds a digital asset (or holds a physical asset that may be digitized) must grant requests to access and use the digital asset unless doing so would violate one of the allowable restriction categories set forth in Section VII of SD 609, Digital Asset Access and Use. If the holding unit declines requests for external non-commercial use, the reason must be based on the nature of the requested use, not the user, and the reason must correspond to one of these allowable restriction categories. The holding unit must document the reason for the denial and retain a record of such denials.

The Rights, Restrictions, and Security team developed this glossary in order to establish a common vocabulary for the Smithsonian to use when documenting (i), in metadata or the digital asset management system, the allowable restrictions that apply to a digital asset and (ii) denials.

No Copyright or Other Restrictions. The Smithsonian has researched the image and object depicted in the image and identified no copyright restrictions¹. In addition, the image and object depicted are otherwise free and clear of any other legal or policy constraints on its use.

Not Researched. No research has been done into provenance, export, copyright, or other possible restrictions.

Unknown — Restrictions Possible. Some research has been conducted, but it is incomplete due to uncertain copyright, export, or provenance records.

¹ This may mean that: (1) a copyright existed at one time but was not renewed, or the copyright may have expired, or the owner may have intentionally placed the Content into the public domain; or (2) the Content was never eligible for copyright protection because it was created by an employee of the United States as part of his or her official duties; or (3) there are no copyright markings or other indications on the Content to indicate that it was copyrighted or otherwise restricted; or (4) Smithsonian records do not indicate any evidence of copyright restrictions.

Restricted by Copyright. Copyright is a proprietary right established in the U.S. Constitution that protects “original works of authorship,” including literary, dramatic, musical, artistic, and certain other intellectual works. Many of the works of art and other content generated and held by the Smithsonian are protected by copyright. Depending on the circumstances under which the object was created or acquired by the Smithsonian, the copyright may or may not be owned by the Smithsonian, which will determine whether, and to what extent, the digital asset may be used and reproduced. For a detailed discussion of copyright, see the Copyright Office website, www.copyright.gov. Ideas and titles are not protected by copyright, but may be protected by other intellectual property laws.

Restricted by Moral Rights. Moral rights are set forth as part of the copyright law in the Visual Artists Rights Act (“VARA”), and they consist of an artist’s right to protect his or her name and reputation from damage caused by intentional distortion or mutilation of his or her artistic works, and other similar protections.

Restricted by Trademark. A trademark is any work, name or symbol, or device, or any combination that is adopted and used by a person or entity to identify goods and services and to distinguish them from those manufactured or sold by others. The purpose of a trademark is to indicate the source of goods or services. Titles, slogans, service marks, logos, and other symbols that identify or are capable of distinguishing goods and services are protected under trademark law. Names of museums, exhibition titles, and other names or designs may be eligible for trademark protection, either under common law principles or by federal registration with the United States Patent and Trademark Office. A trademark owner may prevent others from using the same or substantially similar word, design, symbol or title in a manner that is likely to create confusion in the mind of the public. See www.uspto.gov for more information about trademarks.

Restricted by Patent. A patent is a grant conferring the right to exclude others from making, using or selling an invention. Novel and useful processes and inventions or new designs for useful objects are governed by patent laws.

Restricted by Privacy or Publicity Rights. Privacy and publicity rights cover a wide range of interests. An individual has certain personal and pecuniary interests in his or her name, voice, picture, likeness, and other identifying characteristics that restrict certain commercial uses of these attributes without the individual’s consent. In addition, personally identifiable information such as name, address, and contact information is also protected by privacy laws. Privacy rights also protect individuals from being depicted in a false light or in an embarrassing situation. Images of identifiable children fall in this category.

Restricted by Contract. Any restrictions that may be found in deeds of gift, wills, purchase orders, contracts, licenses, loan agreements, publishing

agreements, etc. The terms of use may include specific acknowledgements and credits, geographic or distribution channel restrictions, or other constraints.

Restricted by Native American Repatriation. Native American and Native Hawaiian objects subject to repatriation may include human remains, funerary objects, sacred objects, and items of cultural patrimony. If a collection object has been repatriated, any associated digital assets may be restricted.

Restricted by Cultural Repatriation. Cultural items returned to their country of origin because of the circumstances of acquisition (e.g., illegally or unethically acquired).

Restricted to Protect Species. This category covers images, other media, or data that reveal locality or collector information on rare, threatened, or endangered species.

Restricted Physical Access. This category covers images, other media, or data that reveal the location of archeological, paleontological, geological, sacred and historic sites.

Restricted as Sensitive Content. This term is defined in different ways by members of individual communities, nations, tribes, ethnic groups, and religious denominations, but usually includes materials that relate to traditional knowledge and practices. Such materials may: a) be considered the private domain of specific individuals, clans, cults, or societies; b) require an appropriate level of knowledge to view and understand; c) threaten the privacy and well being of a community when exposed or disclosed to outsiders; and/or d) give offense if inappropriately used or displayed, or when appropriated or exploited for commercial purposes.

Restricted as Unpublished Research. This category covers raw data, primarily research and manuscripts generated during the course of research, which may be temporarily delayed or restricted against access and use to provide the author of the data with time to compile and publish the data prior to general access. The duration of these limitations varies by professional discipline.

DIGITIZATION AND DIGITAL ASSET MANAGEMENT POLICY

I. Purpose	1
II. Principles	1
III. Background	2
IV. Scope	3
V. Definitions	3
VI. Roles and Responsibilities	6
VII. Unit Digitization Plans	8
VIII. Project Digital Asset Management Plans	8

I. Purpose

This directive describes the policy for the acquisition, creation, management and oversight of Smithsonian digital assets, and mandates development of unit digitization and digital asset management plans. It also establishes the functions and roles of the Smithsonian's Digitization Program Office (DPO), which oversees the implementation of this policy.

II. Principles

The following principles provide the basis for this policy:

- Digitization of the collections (including ancillary information and objects) and management of born-digital materials (assets originally created in digital format) support the Smithsonian's strategic plan and are important goals for the Institution;
- Units, programs, research centers and offices are responsible for setting priorities for digitization, for maintaining digital assets under their control, and for establishing written unit digitization plans and project digital asset management plans that document how these assets are developed and administered throughout their life cycle;
- Digital assets are intended to be usable and interoperable;

II. Principles (continued)

- Digital assets are publicly accessible unless covered by an allowable restriction category, as set forth in SD 609, *Digital Asset Access and Use*;
 - Digital assets are valuable resources and their future economic sustainability throughout their life cycle should be considered at the time of asset creation or acquisition; and
 - The acquisition of objects and collections by Smithsonian units should include provisions for creating and sustaining the digital assets associated with these acquisitions.
-

III. Background

In 2009, the Institution launched a digitization strategic planning initiative, recognizing that digitization is a core activity of the Institution, undertaken to make Smithsonian resources available for the widest possible use by current and future generations. The resulting digitization strategic plan established the requirement for a pan-Institutional policy and guidance to ensure that the Smithsonian manages its digital assets throughout their life cycle as an enterprise resource, and to ensure that digitization efforts are implemented with the highest degree of professionalism and expertise.

Effectively managing the Smithsonian's digital resources should:

- increase the number and quality of digital assets;
- enhance the usability and interoperability of digital assets;
- allow for greater interaction with users via different technology platforms, such as the Internet and mobile computing;
- preserve digital assets that are in danger of loss due to deterioration or obsolescence;
- enhance preservation of physical assets, including collections, by reducing wear and tear on originals;

III. Background (continued)

- use resources more effectively to achieve greater efficiencies in workflow, in use of technologies, and in use of the expertise that is available across the Institution.

Because digital assets are created and acquired at the unit level, stewardship begins at this level. Units must develop digitization and digital asset management plans to guarantee Smithsonian digital resources will be accessible into the future so the Institution can continue pursuing its mission to increase and diffuse knowledge throughout the world.

IV. Scope

This directive applies to all units that acquire, create, or maintain Smithsonian digital assets, prepare them for data interchange and interoperability to support sharing and repurposing, or manage other life-cycle functions of these assets.

This directive covers collections that are digital, which are also subject to SD 600, *Collections Management*. SD 600 and this policy will be harmonized further in future revisions. If there are conflicting requirements between this policy and SD 600, the latter takes precedence for collections that are digital.

Policies governing access and use of digital assets are set forth in SD 609, *Digital Asset Access and Use*.

This directive covers all digital assets of the Institution *except* those assets that contain records of the Institution, as defined by SD 807, *Requests for Smithsonian Institution Information*.¹ These assets are covered under SD 501, *Archives and Records of the Smithsonian Institution*.

V. Definitions

- **Accessibility** — refers to the relative ease with which digital assets are available through

¹ SD 807 defines the business records of the Institution as email, contracts, employee records, donor, vendor and lender records, and other information created, stored, or maintained by the Smithsonian in the course of conducting its business.

V. Definitions
(continued)

technological means to be accessed, shared, exchanged, and otherwise used.

- **Digital asset** — content that is recorded and transferred in a digital format. It may include text, still images, moving images and sound recordings, collections that are digital (i.e., digital art), research datasets and other types of media originally created in digital format or digitized from another format or state (i.e., a digital surrogate) that are created, stored, or maintained by the Smithsonian. For the purpose of this directive, digital assets also include metadata used to describe the digital asset and its content.
- **Digitization** — a set of processes that converts physical resources to a digital form, or that creates materials in a digital form (born digital). These processes include:
 - Identification, selection and prioritization of materials to be digitized;
 - Digital asset creation or conversion;
 - Creation of descriptive and technical metadata sufficient to allow retrieval and management of the digital assets and to provide basic contextual information for the user; and
 - Quality control of digital assets and metadata.
- **Disposition** — the process of permanently removing a digital asset from the Institution by transferring it to another entity or, if it is no longer needed, by destroying it.
- **Interoperability** — the ability of diverse systems to work together effectively.
- **Life-cycle management** — a comprehensive approach to managing digital assets that addresses these assets through all the stages of their “life.” (Also see “Project digital asset management plan,” below.) It begins with planning for the creation or acquisition of a digital asset, continues through the maintenance and use of the asset, and ends only

V. Definitions (continued)

when the asset is legally transferred to another entity or disposed. Life-cycle management functions are sequential but a digital asset may go through certain stages of the life cycle multiple times as it is used by different groups or for different purposes.

- **Metadata** — the information used to describe the intellectual content as well as the technical properties of a digital asset, such as date/time of creation, subject, restrictions, equipment used, dimensions, location, title or other descriptors. It may be structured (following Smithsonian and community-specific guidelines) in ways that allow easier access and interoperability, and that ensure the asset can be used in the long term.
- **Preservation** — the process of maintaining digital assets in a usable form across time, formats, and media.
- **Project digital asset management plan** — a written plan associated with a unit project that defines the roles, responsibilities, and processes needed to ensure the systematic attention to a digital asset throughout its life cycle, from creation or collection, through use, preservation and, if appropriate, disposition. (Also see “Life-cycle management,” above.) The plan addresses aspects such as impact and use, creation and receipt of data, description of data, access issues, preservation for long-term sustainability, and ownership. (In an information technology context, these plans may also be referred to as data management plans.)
- **Trusted digital repository (TDR)** — a mechanism for providing reliable, long-term access to the managed digital resources of those who deposit their digital assets in the repository. A TDR:
 - Consists of hardware, software, human resources and administrative structures to support the viability of the repository;

V. Definitions (continued)

- Must be economically sustainable and have practices and policies that ensure the ongoing access and management of the deposited digital assets;
 - May be local, central or distributed in infrastructure and management.
- **Unit** — a Smithsonian museum, research center, or office. For the purpose of this directive, a unit includes all the employees, volunteers, interns, contractors, Fellows, and collaborators associated with the unit.
 - **Unit digitization plan** — a written plan that defines a unit's digitization program. The plan addresses aspects such as unit objectives and priorities for digitization, responsible parties for unit-based digitization activities, performance metrics and digitization funding sources.

VI. Roles and Responsibilities

The **Secretary** is responsible for establishing the Institution's goals to facilitate digitization of Smithsonian resources at the highest standards of excellence, for scholarly research, and educational purposes. The Secretary may delegate to other staff the responsibility to implement this policy and carry out the direct management of digitization activities.

The **Under Secretaries** are responsible for ensuring that digitization at the Smithsonian is carried out in compliance with this policy through oversight of unit directors and by approving unit digitization plans. The Under Secretaries or their delegates may provide overarching digitization goals for their units, reflecting Institutional priorities and programs as a basis for unit digitization plans and digitization goals.

Unit directors are responsible for ensuring that their unit's digitization activities, including development of unit digitization plans (and their associated progress reports) and project digital asset management plans, are carried out in compliance with this policy, and are attainable with available resources. Unit directors are the initial approval authority for these plans, and must

VI. Roles and Responsibilities
(continued)

submit them to the DPO and the Under Secretary who oversees their unit. Unit directors may delegate authority and assign responsibility for the development of these plans to appropriate unit staff.

The ***Office of the Chief Information Officer (OCIO)*** is responsible for developing and maintaining the information technology infrastructure that supports the Institution's digitization efforts. The OCIO oversees the activities of the DPO and consults with the Secretary, Under Secretaries, and unit directors about information technology needs in support of this policy.

The ***National Collections Program (NCP)*** is responsible for improving the stewardship and management of Smithsonian collections by providing central leadership and policy oversight of Institution-wide collections initiatives, including the administration and implementation of SD 600, *Collections Management*, and the review and approval of collecting unit collections management policies. The NCP is responsible for coordinating with the DPO collections management policies that may affect implementation of the requirements set forth in this directive for collections that are digital.

The ***Digitization Program Office (DPO)*** is responsible for improving the overall stewardship and long-term management of the Smithsonian's digital assets by providing leadership and policy oversight of the pan-Institutional digitization program. Working with Smithsonian senior management, and in concert with a Digitization Program Advisory Committee (DPAC), the DPO guides implementation of the Smithsonian's digitization strategic plan, and develops long-term strategies, policy, best practices and procedures that address pan-Institutional digitization needs.

The DPO also: advises senior management on effective implementation of this directive and recommends revisions, as appropriate; assists units in developing unit digitization plans and project digital asset management plans; recommends unit digitization plans for approval by the Under Secretaries;

VI. Roles and Responsibilities
(continued)

aggregates and reports statistics regarding unit digitization activities; and serves as a coordinating unit for digitization across the Institution and communicating Institutional digitization priorities as appropriate. In addition, the DPO keeps abreast of best practices in digitization and serves as the Smithsonian's representative to external forums such as interagency committees and working groups, and national and international conferences.

As part of its oversight of this directive, the DPO is responsible for developing guidelines for the unit digitization and project digital asset management plans called for in this directive, and for initiating the call for units to submit these plans.

The ***Digitization Program Advisory Committee*** (DPAC), composed of representatives from across the Institution, assists the DPO in implementing the digitization strategic plan by advising on policies, standards, priorities, processes, performance metrics, and funding strategies for digitization at the Institution.

VII. Unit Digitization Plans

Each unit shall develop a unit digitization plan that defines the unit's digitization program, reflecting a balance between unit and Institutional priorities. Each unit's digitization plan will be approved by the unit director and submitted to the Under Secretary responsible for the unit and to the DPO. The DPO shall provide units with guidance on the development of these plans.

Units must review and update digitization plans every three years. In addition, they submit annual reports to the DPO which track progress against their established goals, using metrics defined in unit digitization plans.

VIII. Project Digital Asset Management Plans

All digital assets shall be associated with a unit project. For the purpose of this policy, a unit project is defined as a concentrated group of digitization or collecting activities that take place as part of a larger unit program and that exist to support the goals and objectives of

**VIII. Project Digital
Asset Management
Plans** (continued)

that program. Unit projects have well-defined scopes and can be of varying size and duration. Units determine what constitutes a project, and define a project's parameters.

Units shall develop digital asset management plans for every unit project that collects or creates digital assets. These plans must cover the full data life cycle (from planning for data creation to accessible archiving, preservation, and possible disposition) for each unit project that creates or collects digital assets. The DPO shall provide units with guidance in developing these plans. Project digital asset management plans will be approved by the unit director and submitted to the DPO.

Project digital asset management plans shall be developed at the beginning of every new project and shall be updated and revised as a project continues, in accordance with the scope and needs of each project.

Units also shall ensure that their unit digitization plans provide yearly goals that identify the number of project digital asset management plans they intend to develop for their unit's extant and legacy projects.

New and revised project digital asset management plans shall be approved by the unit director and submitted to the DPO.

CANCELLATION:
INQUIRIES:

None.
The Digitization Program Office (DPO) in the Office of the Chief Information Officer (OCIO)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue



SMITHSONIAN INSTITUTION

OFFICE MEMORANDUM 671 (R)

September 5, 1990

Date Last Declared Current: August 2, 2005

TO: Heads of bureaus and major offices

SUBJECT: Protocols and Other Agreements with Foreign Governments
and Institutions

Any Smithsonian bureau that contemplates entering into a protocol or project agreement with a foreign government or institution should bring such plans to the attention of the Office of International Relations (OIR) as early as possible.

While protocols and project agreements are a normal and often necessary part of conducting research or performing other museum services overseas, they can have adverse legal, diplomatic or financial consequences if not crafted carefully. OIR and the Office of General Counsel (OGC) will provide advice and assistance to ensure that proposed international undertakings do not expose the Institution to possible liability because of oversight or imprecision in the negotiation and drafting process.

All agreements with foreign entities should be submitted in draft to OIR, which will undertake the necessary review with OGC and other appropriate offices. On some occasions, consultation with the Department of State may be deemed necessary.

No protocol or project agreement with a foreign entity may be signed until both OIR and OGC have had an opportunity to review and clear the proposed text.

John F. Jameson
Assistant Secretary for Administration

CANCELLATION: OM 671, Coordination of Contacts with Foreign Governments and Institutions dated 7/12/65

INQUIRIES: Office of International Relations (OIR)

RETENTION: Indefinite. This Office Memorandum is subject to review for currency 18 months from the date hereof.

FILING INSTRUCTIONS: File this Office Memorandum in numerical sequence with other current Office Memoranda.

COPIES: Copies of this Office Memorandum may be obtained through the Operations Branch, Management Analysis Office.



SMITHSONIAN DIRECTIVES TRANSMITTAL

April 22, 1992

TO: Heads of organization units

SUBJECT: OM 707(R), Handling Outside Permission Requests to Use Smithsonian Images-

Office Memorandum 707 has been retitled, Guidelines for Handling outside Requests to Use Smithsonian Images, and principally revised to:

1. Reflect that fees for photographic usage rights may be charged at the discretion of Smithsonian units; and
2. Provide a minimal guideline for Smithsonian units charging photographic usage fees.

Please replace OM 707 dated July 8, 1985 and OM 756, Amendment 3, dated May 9, 1978 with the attached revision.

Nancy D. Suttentfield
Assistant Secretary for
Finance and Administration

CANCELLATIONS:	OM 707(R) dated July 8, 1985 and OM 756(R), Amendment 3 dated May 9, 1978
INQUIRIES:	Office of the Assistant Secretary for Museums and General Counsel
RETENTION:	Indefinite. This OM is subject to review for currency 18 months from the date hereof.
FILING INSTRUCTIONS:	File this OM in numerical sequence with other current Office Memoranda.
COPIES:	Copies of this Office Memorandum may be obtained through the Office of Financial and Management Analysis.



SMITHSONIAN INSTITUTION

OFFICE MEMORANDUM 707(Rev)

April 22, 1992

GUIDELINES FOR HANDLING OUTSIDE REQUESTS TO USE SMITHSONIAN IMAGES

1. BACKGROUND FOR PERMISSION REQUESTS. The Smithsonian receives many outside permission requests to reproduce images in Smithsonian collections that may or may not be copyrighted. The images include literary works, photographs, films, sound recordings, etc.

2. GUIDELINES FOR HANDLING PERMISSION REQUESTS. A wide range of Smithsonian units handle permission requests from outside sources, with each unit having its own procedures for granting permission. Because of the diversity in these procedures and the complexities of the Copyright Law of 1976, Exhibit A contains a set of guidelines for Smithsonian units handling permission requests from outside sources.

3. BACKGROUND FOR PHOTOGRAPHIC REPRODUCTION FEES. Charging a fee for photographic usage is common practice in the United States, especially in art, history and general museums.

4. EFFECTIVE DATE. Effective with this Office Memorandum, Smithsonian Institution units can charge fees for photographic reproduction rights.

5. CURATORIAL REVIEW. Established procedures about curatorial review and approval of permission requests are still in effect.

6. CHARGES. In addition to fees for photographic reproduction rights, applicable charges will continue for original photography or for purchases of photographic materials such as photographs, negatives, transparencies, and slides, or other services and materials.

7. GUIDELINES FOR PHOTOGRAPHIC REPRODUCTION FEES. Exhibit B provides a minimal guideline for Smithsonian units charging photographic usage fees. Care has been taken to develop guidelines that will not inhibit publication of Smithsonian images, especially in the areas of non-commercial scholarly publishing.

The guidelines provide a structure and topics that may be appropriate for consideration by units that plan to reestablish photographic usage fees. Smithsonian units may develop more detailed fee arrangements as needed.

OM 707 (Rev)
4/22/92

-2-

Fees are waived or reduced at the discretion of the bureau. It is recommended that bureaus maintain a fee schedule in concert with one another and develop written policy about exceptions to their fee schedule as well.

GUIDELINES FOR HANDLING PERMISSION REQUESTS FROM OUTSIDE SOURCES

1. COPYRIGHT INTERESTS. Before granting permission, Smithsonian units should always be aware of thrights and interests that the Institution has in the requested material. Some material is in the public domain (either never copyrighted or the copyright has expired) and permission is not re·quired to reproduce it. Even when the material is in the public domain, however, the Smithsonian may restrict access or impose conditions to preserve or prritect legitimate Institutional interests in the material.

Other material is copyrighted and permission must be received from the copyright owner before it can be reproduced. Additionally, the Smithsonian may be obligated to honor (comply with or enforce) restrictions other than copyright restrictions associated with the material, such as a restricted gift.

(In many instances, copyright interests are not always clear cut. For example, material copyrighted by the Smithsonian or works in the public domain published by the Institution may contain photographs, illustrations, etc., that were reproduced by permission of a non-Smithsonian copyright owner under a one-time use agreement. Because the Smithsonian does not have the right to grant permission for material it does not own, the outside requester should be referred to the proper copyright owner (name and address, if known) to obtain permission for the reproduction. When the Smithsonian holds the copyright to a work created by an individual outside the Institution, it is sometimes advisable to have the outside source, as a courtesy, also discuss the use with the creator. This is particularly true with living donors.

Where copyright laws apply, some copyrighted material is governed by the provisions of the Copyright Law of 1909 while othematerial falls under the provisions of the Copyright Law of 1976., Contact the Office of General Counsel for assistance about copyright laws or their applicability to a particular permission request.

2. CONSIDERATIONS WHEN HANDLING REQUESTS- After determining copyright interests, some basic considerations when handling permission requests are:

requesting specific information from the outside source
on the nature and extent of use of the requested material

- evaluating the proposed use of the material for appropriateness (e.g., the scholarly or educational nature of the proposed use)
- providing the proper citation for the credit line
providing the proper citation for the copyright notice
ensuring proper use of the Smithsonian name
charging fees, if appropriate according to guidelines for photographic usage fee
stating conditions for the use of the material by a form letter, if appropriate
obtaining a signed consent from the outside source agreeing to the conditions
- using copyright disclaimer language when copyright interests are in doubt

3. INFORMATION PROVIDED BY REQUESTER. To evaluate effectively a permission request, the request should be in writing and contain specific information on the use of the requested material. The requester also should provide information about the media, publication or electronic and film media, in which the material will appear, such as full title of publication, author, publisher, and probable date of publication. Additionally, the outside requester should indicate the number of uses (e.g., one-time use or multiple use) and, if appropriate, the market for the requested rights (e.g., U.S. and Canada, world in English, or world in all languages). In most instances, the Smithsonian grants permission for one-time use only of the requested material. If the outside requester wishes to reuse the material in a later edition or in another media form, a new permission request should be submitted. This information should be clearly conveyed to the outside requester.

4. APPROPRIATENESS OF REQUEST. Smithsonian units should evaluate the proposed use of the material for appropriateness. Examples of inappropriate requests might include:

use of material in a context which might be defamatory or misleading

use of the material in a publication or context in which the scholarly or educational benefit is negligible or not clear

use of such a substantial portion of copyrighted source material that it diminishes the value of that source

use which would compete with or detract from an existing or planned Smithsonian use

use of the material in a manner that would cause undue embarrassment to the Institution or the creator

Inappropriate requests need not be approved, or may be approved subject to additional conditions to which the user must agree. Direct questions concerning appropriateness or additional conditions to the Office of General Counsel.

(S. CREDIT LINE. A credit line is a brief statement of the material's source. It is an accepted practice to provide a credit line when responding to requests. Phrase the credit line as it should appear in the publication. For example, a credit line might read: "Courtesy National Air and Space Museum."

6. IMPROPER USE OF THE SMITHSONIAN NAME.

- a. Credit line. If the material is not copyrighted and its proposed use is in a publication or context in which it would appear unwise to associate the name of the Institution, a Smithsonian unit may instruct the outside requester not to use a credit line.
- b. Advertising. Units should guard very carefully against the unauthorized commercial use of the Smithsonian name by others. Such uses generally give the appearance that the Institution endorses the product or one product over another, or is associated with the advertiser. If the proposed use of the material is for commercial advertising purposes, the request should be discussed with the Office of General Counsel.

7. COPYRIGHT NOTICE. If there is a copyright in the material, a copyright notice must appear with the material. Ordinarily, that notice will accompany the credit line. For example, "Smithsonian Institution, 1972. Courtesy, National Air and Space Museum." Occasionally, the credit line and copyright notices may be separated. Also, in rare instances, the copyright and credit lines may be deleted altogether for a copyright notice

in the name of the user or publisher. Questions about separation or deletion of a copyright notice should be directed to the Office of General Counsel before authorization.

a. FEES. To help defray the administrative and materials costs associated with processing the numerous requests which the Institution receives for the use of pictures, it is Smithsonian policy to charge a "production fee." The Office of Printing and Photographic Services or a bureau will charge a minimum production fee when the services of the Office of Printing and Photographic Services or the bureau's photographic laboratory are involved. In addition, Smithsonian units may charge a photographic usage fee subject to Exhibit B.

9. USE OF FORM LETTER. If a unit receives many permission requests, it should consider using a form letter, tailored to its particular needs, to respond to requesters. It is a good method for informing outside requesters of conditions to meet for approval of requests. Although conditions may vary between units, suggested key elements in a form letter are:

in the case of copyrighted material, a stated requirement that the publication be copyrighted or that the copyright notice accompany the reproduction

insertion of the proper citation for the credit line and copyright notice

stipulation that permission is for one-time use of the material, unless otherwise noted

request the provision of at least one free copy of the final publication to the Smithsonian

a space for estimating the charges

stipulation that the use of the material is only as specified in the request

10. CONSENT TO CONDITIONS. If a Smithsonian unit specifies certain conditions as a prerequisite for granting permission, it is necessary to have the requester sign a consent agreeing to the conditions. An expedient method to obtain written consent is to provide the outside requester with two copies of the form letter mentioned in section 9 and request the return of one signed copy to the unit.

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11. COPYRIGHT DISCLAIMER. To protect the Smithsonian especially when certain rights or interests are in doubt, Smithsonian units should notify the outside requester that responsibility for ascertaining all additional rights to the material and obtaining all necessary permissions lies with the requester. The following example shows suggested copyright disclaimer language.

"Permission is granted only to the extent of the Smithsonian Institution's ownership of the rights relating to the request. Certain works may be protected by copyright, trademark, or related interests not owned by the Institution. The responsibility for ascertaining whether any such rights exist, and for obtaining all necessary permissions remains with the applicant."

The Office of General Counsel is available to assist Smithsonian units in tailoring copyright disclaimer language to meet their particular needs.

12. REQUESTS TO USE MATERIAL ON RADIO, TELEVISION, AND VIDEO. All requests to read or otherwise use copyrighted and uncopyrighted material in these media should be cleared by the Office of Telecommunications or by individual bureaus, in accord with the policy and responsibilities stated in OM 82, Office of Telecommunications.

13. ADDITIONAL INFORMATION. Contact the Office of General Counsel for additional information and guidance concerning permission requests.

Smithsonian Institution
Photographic Usage Fees Guidelines

This exhibit provides a minimal guideline for Smithsonian units charging photographic usage fees. Smithsonian units may develop more detailed fee arrangements as needed.

1. FEES. Fees are for one-time, non-exclusive use, world rights, one language only. Re-use of the material in a later edition or in another publication will be considered a new request.

	Per image	<u>Black and white</u>	Color
FEES	One-time editorial use (textbook, exhibition catalogue, magazine, documentary film, video, etc.)	\$50.00	\$100.00
	One-time non-editorial use (cover, book jacket, record album, etc.)	\$100.00	\$200.00
	Special media use (commercial motion picture, television, video, etc.)	\$100.00	\$200.00

Commercial product -----Permission is discretionary
and subject to licenses
which may be negotiated
by Smithsonian's Product
Development and Licensing.

Advertising and promotion use -----Permission is discretionary
and subject to review by
other S.I. offices. Fees
are separately negotiable.

Other use -----Permission is
discretionary.

2. OTHER CHARGES. In addition to the photographs usage fee, there will be applicable charges for purchase of photographic materials, original photography, or other services and materials.

3. SCHOLARLY PUBLICATIONS. Applicants may request a waiver or reduction of fees for reproduction of an image in a scholarly publication. -The request should be submitted in writing and approval is at the discretion of the museum. A scholarly publication is defined as a publication that reproduces an image for an educationj cultural purpose and is directed to a limited educational/professional audience with, for books, a limited press run in the range of 4,000 - 8,000 copies.

4. PERMISSION TO REPRODUCE. Terms and conditions for reproduction are specified in the permission form available from each museum. Payment of the photographic usage fee is due on receipt of invoice. Fees are non-refundable. When paid, the receipted invoice together with the counter-signed permission form constitute official authorization.

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SMITHSONIAN INSTITUTION

OFFICE MEMORANDUM OM 719 (Rev)

May 9, 1986

TO: Heads of Organization Units (Post or Circulate to Members of the Professional Research Staff)

SUBJECT: Smithsonian Policies on Publishing by the Institution and by Individual Staff Members.

(This revised Office Memorandum incorporates into one directive federally funded and trust funded publishing policies, guidelines, and related procedures. Part A highlights general policies including publishing criteria and the responsibilities of the Smithsonian Institution Press (SIP), staff authors, and sponsoring organization units. Procedures and regulations concerning federally funded publications are found in Part B and those concerning trust funded publications are found in Part C. Part O provides guidance for Smithsonian authors submitting manuscripts to outside publishers and journals. For additional information on publishing policies and procedures, contact SIP.

Robert Adams
Secretary

CANCELLATION: OM 719 (Rev) dated 04/25/75
OM 719 (R v) Supplement 1 dated 8/24/78
OM 805 (Rev) dated 06/26/79 \

INQUIRIES: Smithsonian Institution Press

RETENTION: Indefinite. This OM is subject to review for currency 18 months from the date hereof.

FILING INSTRUCTIONS: File this OM in numerical sequence with other current Office Memoranda.

COPIES: Additional copies of this OM may be obtained through the Operations Branch, Management Analysis Office.

TABLE OF CONTENTS

Part A. General Publishing Policies

1. Background
2. Purpose
3. Publishing Responsibility
4. Publishing criteria
5. Federally funded publications
6. Trust funded publications
7. Outside publishing for Smithsonian authors
8. Additional information

Part B. Federally funded Smithsonian publications

1. Smithsonian Series
 - a. General description
 - b. Distribution
 - c. Manuscript preparation
2. Series publishing for Smithsonian authors
 - a. Substantive review by sponsoring units
 - b. Submission to SIP
 - c. Author's copies
3. Series publishing for non-Smithsonian authors
 - a. General requirements for acceptance
 - b. Initial substantive review
 - c. Request for sponsorship
 - d. Smithsonian review of manuscripts
 - e. Submission to SIP
 - f. Page charges
 - g. Smithsonian publication grants
 - h. Author's copies
4. Non-Series publications
 - a. General publications
 - b. Manuscript preparation and review
 - c. Manuscript submission to SIP

Part C. Trust funded Smithsonian publications

1. Smithsonian Publications Council
 - a. Purpose
 - b. Membership
 - c. Responsibilities
 - d. Submission of proposals
2. Publishing proposals
 - a. General requirements
 - b. Publications exempt from submission to the Council
3. Smithsonian Institution Press
 - a. University Press Division
 - b. Direct Mail Division
4. Other Smithsonian organizations
5. Outside publishers

Part D. Outside publishing by Smithsonian authors

1. Substantive review
2. Procedural review and standards of conduct clearance
3. Outside scholarly journals (including monographic series)
 - a. Page charges and reprints
 - b. Copies

A. GENERAL PUBLISHING POLICIES.

1. BACKGROUND. Historically, the Smithsonian Institution has been a major publisher of scholarly works in the fields of art, history, science, and technology. Smithsonian publications include works by the Institution's staff and by non-Smithsonian scholars. Publications produced with either federal funds or trust funds are subject to various reviews by professional staffs to ensure that those issued by the Institution are of high quality. The Smithsonian will continue to cooperate in the academic community and, whenever possible, to offer publication facilities to outside authors for works that are intrinsically excellent, relevant to the Institution's interests, and difficult to publish elsewhere.

2. PURPOSE. This office memorandum contains policy and procedures regarding federally funded and trust funded Smithsonian publications, and provides guidance for Smithsonian authors submitting manuscripts to outside publishers and journals.

\ 3. PUBLISHING RESPONSIBILITY. The Smithsonian Institution Press, (SIP) serves as the publisher for manuscripts that originate in Smithsonian bureaus that are to be published with federal funds. While it is not the policy of the Institution to require that Smithsonian staff authors or sponsoring Smithsonian organizations units use the Press for the publication of manuscripts to be funded from nongovernment sources, Smithsonian policy encourages staff authors or sponsoring units to give the Press an opportunity to compete for such publications along with commercial publishers, university presses, and other bidders for publishing rights.

4. PUBLISHING CRITERIA. The general policy of the Smithsonian Institution is to publish works derived from its own resources and appropriate to its overall purpose, "the increase and diffusion of knowledge... Criteria for Smithsonian publications include:

relevancy of the material to the collections,
interests, and goals of the Institution

appropriateness of the material for scholarly
or educational purposes, or for bringing
Smithsonian-related topics to the general
public awareness

quality of content and presentation

sound financial forecasts and controls,
whether the project is subsidized or self-
supporting

5. FEDERALLY FUNDED PUBLICATIONS. Federally funded Smithsonian publications are produced by SIP. Works by Smithsonian scholars and their non-Smithsonian colleagues are published in several discipline-oriented monographic series. Exhibition catalogues, museum guides, brochures, annual reports, and other similar manuscripts are published apart from the Smithsonian Series and are categorized as General Publications. Procedures and regulations concerning federally funded Smithsonian publications are given in part B.

6. TRUST FUNDED PUBLICATIONS. Trust funded publications are produced by the University Press and Direct Mail divisions of SIP and by other Smithsonian organizations. Publication is also done under contract between the Smithsonian and commercial publishers, university presses, and other appropriate organizations. All trust funded book publishing proposals from SIP and from Smithsonian organizations, whether funded wholly by a bureau or by contract with a commercial or other publisher, are subject to review by the Smithsonian Publications Council (SPC). This includes publication by Smithsonian bureaus or units where an outside publisher provides all the costs of publication. Procedures and regulations concerning trust funded publications are given in part C.

7. OUTSIDE PUBLISHING FOR SMITHSONIAN AUTHORS. The work of Smithsonian staff should be communicated freely to their professional colleagues outside the Institution and should be judged by them. Staff members are encouraged to submit scholarly and scientific manuscripts to outside publishers and journals but are urged, whenever appropriate, to consider publishing the results of their studies through SIP. Procedures and regulations concerning outside publishing are given in Part D.

8. ADDITIONAL INFORMATION. Contact SIP for additional information and guidance concerning federally funded and trust funded publishing policies and procedures.

B. FEDERALLY FUNDED SMITHSONIAN PUBLICATIONS. -

1. SMITHSONIAN SERIES.

a. General description. Smithsonian Series publications are scholarly monographs arising from, or closely related to, Smithsonian sponsored research and are published in

several federally funded, discipline-oriented Smithsonian Series. Currently there are ten Series: Smithsonian Contributions to Anthropology, Astrophysic, Botany, the Earth Sciences, the Marine Sciences, Paleobiology, and Zoology; and Smithsonian Studies in Air and Space, Folklife, and History and Technology.

b. Distribution. Series monographs are distributed without charge by mailing lists to libraries, universities, and similar institutions and to leading scholars in the subject fields. Changes in the lists are authorized by the museums, bureaus, and offices that sponsor manuscripts in the Series and by the Gifts and Exchange Program, SI Libraries. SIP oversees the distribution of Series publications.

c. Manuscript preparation. Style and format requirements for preparation of Series manuscripts are issued by SIP. The requirements appear inside the back cover of current Series publications. Instruction booklets for specialized preparations (e.g., illustrations, Literature Cited) are available from SIP. If an electronic version of the manuscript is to be used for typesetting, the author should prepare it according to the SIP manual for electronic manuscripts.

2. SERIES PUBLISHING FOR SMITHSONIAN AUTHORS.

a. Substantive review by sponsoring units. Smithsonian authors should submit their manuscripts to their own major organization unit for substantive review. Each major organization unit is responsible for developing its own review process to screen manuscripts for accuracy, organization, completeness, scholarship, and importance. The professional staffs should use the utmost care in reviewing manuscripts for significance of subject matter and relevance to Smithsonian interests before approving and forwarding them for publication.

b. Submission to SIP. After approval by the author's major organization unit, the manuscript, original illustration art, and form SI-36, "Submission of Manuscript to Smithsonian Institution Press for Series" Publication, should be submitted to SIP. The sponsoring unit supplies funding for manufacturing and distribution costs. The manuscript and artwork will be reviewed by SIP for style and format requirements in the appropriate Series. If the author wants SIP to use an electronic version of the manuscript for typesetting, this should be noted on the SI-36 form, and SIP will review the printout for conformity to instructions in its manual for preparing electronic manuscripts. The manuscript will be accepted and a cost estimate rendered when all preparation requirements have been met.

c. Author's copies. Smithsonian authors and coauthors should indicate on form SI-36 the number of copies they want for personal distribution. Routinely, 100 copies are supplied to the Smithsonian senior author of the work and a total of 50 copies to any additional Smithsonian and/or non-Smithsonian author(s). A request for a larger number of copies must be approved on form SI-36 by the sponsoring Smithsonian unit officer who authorizes submission of the manuscript to SIP. (A total of 50 copies is the maximum number that may be authorized for non-Smithsonian authors.) After the initial mailing-list distribution of the publication, SIP retains a small inventory of copies for response to requests from institutions not on the mailing list. Authors or sponsoring units may secure additional copies from SIP's inventory as long as the supply lasts.

Any Series author may contract through SIP for the private purchase of additional copies (minimum order 50) at a discounted price. Intention to contract for such a purchase should be indicated on form SI-36.

3. SERIES PUBLISHING FOR NON-SMITHSONIAN AUTHORS. {)

a. General requirements for acceptance. Although the Series publications of the Smithsonian Institution are intended primarily for publishing the results of research by its own professional staff, contributions from non-Smithsonian authors will be considered for publication in these series. Contributions should include the results of original observations and research are most likely to be accepted if one or more of the following criteria are met:

all or a substantial portion of the work
has been accomplished at the Smithsonian

the work is based primarily on the
collections or other resources at the
Smithsonian

the subject is strongly relevant to the
research of the Smithsonian

Because staff time and funds for production costs are limited, meeting one or more of the above criteria should not be construed as a guarantee that a manuscript will be accepted for publication. In addition, no manuscript will be accepted for publication that has been or is anticipated to be published elsewhere, either wholly or in essential part.

b. Initial substantive review. Substantive review of the manuscript by one or more specialists prior to submission to the Smithsonian is strongly encouraged. The author should include the names of these reviewers when applying for publication in the Smithsonian Series.

c. Request for sponsorship. Before submitting a manuscript for publication, a non-Smithsonian author must contact an appropriate organization unit in one of the museums or other Smithsonian bureaus and request sponsorship for the manuscript. If submission of the manuscript is invited, the author should submit to the reviewing unit at least two copies of the manuscript (letter-quality original and one or more duplicate carbon or reproduction copies) along with photographs or other good facsimiles of the original illustration art. Original artwork should not be sent until the reviewing unit has approved the manuscript and is ready to submit it to SIP.

d. Smithsonian review of manuscripts. Manuscripts will be critically reviewed by at least two authorities selected by the organization unit responsible for the substantive review. Reviewers may include Smithsonian staff and/or outside specialists. Manuscripts will be evaluated on the basis of the publishing criteria mentioned in section 4 of Part A and section 3 a of Part B.

e. Submission to SIP. After the manuscript has received substantive approval, the sponsoring unit will submit to SIP the original copy of the manuscript, all original art, and form SI-36. The manuscript and artwork will be reviewed by SIP for conformity to style and format requirements in the appropriate series. If an electronic version of the manuscript is to be used for typesetting, this should be noted on form SI-36, and SIP will review the printout for conformity to instructions in its manual for preparing electronic manuscripts. The manuscript will be accepted and a cost estimate rendered when all preparation requirements have been met.

f. Page charges. Page charges are assessed for any work that does not have a Smithsonian staff member as a major contributing author. Before a potential sponsoring unit begins a substantive review, it may request a preliminary estimate of page charges from the Production Manager, SIP. These page charges cover manufacturing and distribution. Authors having funds available for payment of the page charges should furnish a written statement to the reviewing

-6

unit guaranteeing payment (and naming the source of payment) for the estimated page charges. Generally, it is expected that the external organization that employs or sponsors the author or supports the research will provide funds for this purpose. If the manuscript is later submitted by the reviewing unit to SIP for publication, the page charge estimate will be confirmed or updated by SIP. The total page charge amount must be received by the sponsoring Smithsonian unit before typesetting can be authorized. Authors having insufficient funds may apply for a Smithsonian publication grant (see section g. below).

Major organization units may fund publications resulting from symposia that they have sponsored or from research for which they have contracted.

g. Smithsonian publications grants. Application for full or partial support of page charges should accompany the manuscript when submitted to the Smithsonian for substantive review. On occasion, the director of the sponsoring bureau or major organization unit may apply to an appropriate Smithsonian fund for a publication grant on behalf of the author.

The appropriate grant review committee will evaluate all manuscripts for which publication grants have been requested and which have been substantively reviewed and found acceptable for publication. Grants will be awarded to those manuscripts deemed most worthy of support. Preferential treatment, in some instances, should be considered for outside authors closely associated with the Institution such as research fellows, honorary research associates, etc.

Manuscripts that are judged acceptable for publication but are not awarded a publication grant may be held over, with the concurrence of the author, for further consideration during the following fiscal year. These manuscripts will be considered by the grant committee separately from and prior to new manuscripts that are being evaluated for the first time.

h. Author's copies. Only 50 copies for the author(s)'s personal distribution are included in the page charges. This number can be increased if the additional cost is included in the SIP confirmed estimate and is part of the payment received by the sponsoring unit before typesetting begins. Additional provisions for the private purchase of extra copies are described in part B, section 2c.

4. NON-SERIES PUBLICATIONS.

a. General Publications. This term applies to manuscripts submitted by Smithsonian organization units and published with federal funds apart from the Smithsonian Series. The sponsoring unit supplies funding for manufacturing costs.

b. Manuscript preparation and review. Procedures for internal review of General Publication manuscripts are the same as for those in the Smithsonian Series (see part B, section 2a). If an electronic version of the manuscript is to be used for typesetting, the author should consult with the Managing Editor, General Publications, for instructions before preparing the manuscript. Manuscripts should be submitted to the author's major organization unit for substantive review and approval prior to submission to SIP.

c. Manuscript submission to SIP. After approval by the sponsoring organization unit, the manuscript, original illustration art, and form SI-36a, "Smithsonian Institution Press Submission Form," should be submitted to SIP. Two copies of the manuscript are required: a letter-quality original and one duplicate (either carbon or reproduction). The completed form SI-36a should include the following information: delivery date required, quantity, physical particulars (e.g., desired trim size), and delivery site. The author should follow the Managing Editor's instructions for delivery of an electronic version of the manuscript if it is to be used for typesetting. A cost estimate will be provided to the sponsoring unit.

C. TRUST FUNDED SMITHSONIAN PUBLICATIONS.

1. SMITHSONIAN PUBLICATIONS COUNCIL.

a. Purpose. The Smithsonian Publications Council is responsible to the Secretary for reviewing and evaluating all proposals for trust funded publications from SIP and all other Smithsonian organizations.

b. Membership. The Council consists of a chairman and five members selected as being broadly representative of the Institution as a whole, rather than of any individual discipline or function. The Assistant Secretary for Public Service serves as Chairman of the Council. The Council meets monthly, with agenda and minutes handled by a coordinator appointed by the Chairman of the Council.

c. Responsibilities. The Council is responsible for:

evaluating publishing proposals from SIP
in regard to the publishing criteria in
part A, section 4, approving or rejecting
each project on its merits

evaluating all Smithsonian book publishing
proposals in regard to the publication
criteria described in part A, section 4
(including contract arrangements for such
publications) by bureaus and other
organization units (including works of
individual staff members carried out as
part of their Smithsonian
responsibilities) for publication outside
the Institution and making recommendations
to the Secretary in all cases that merit
further consideration

receiving and reviewing periodic reports
on the status of all authorized publishing
projects

considering other matters of publishing
policy as appropriate at the Smithsonian
and submitting recommendations to the
Secretary

d. Submission of proposals. Procedures for submitting
publication proposals to the Council are found in sections 2
to 5 below.

2. PUBLISHING PROPOSALS.

a. General requirements. Smithsonian Institution
organizations, or individuals planning trust funded
publications for sale to commercial or educational markets
must submit proposals to the Council through the appropriate
organization head. This includes publications by:

the University Press and Oirecf Mail
divisions of SIP

all other Smithsonian organizations

contracts between Smithsonian organization
units or staff members and commercial
publishers, university presses, and other
appropriate organizations

Prior to submission to the Council and as early as possible, all contractual details should be discussed with the Smithsonian's Contracts Office, which will provide for review by the Office of the General Counsel. Proposed arrangements between commercial publishers and Smithsonian organization units or individuals should then be submitted to SPC for approval before commitment of SI funds or the release of manuscript and illustrations or other substantive parts of the project. Such proposals must consist of:

- a description of the project and evidence that it has been approved by the appropriate bureau director or equivalent

- a draft contract or a letter from the publisher setting forth contractual terms to include copyright status, selling rights, financial remuneration, and full obligation of author/bureau

- an estimate from author/bureau of anticipated financial return as a result of commercial publication

When publication by an outside commercial or university press is being considered by an organization unit or staff member planning a trust-funded publication, it is urged that SIP be notified to allow it the option of bidding for publication rights

b. Publications exempt from submission to the Council.

Publications specifically prepared for museum exhibitions with federal funds, grants, gifts, or subsidies, and intended for sale or distribution only during the period of the exhibition at the Smithsonian are not subject to approval by the Council.

Publications by Smithsonian staff members that are written on their own time and with their own resources are exempt from Council approval unless they are to be published by SIP. Staff members are reminded of their obligation to discuss individual publication projects with their supervisors and the Smithsonian ethics counselor. (See OM 688, especially sections 7(c), 7(d), and 12(b).)

3. SMITHSONIAN INSTITUTION PRESS.

a. University Press Division. The Director of the University Press Division will submit proposals to the Council for scholarly, trade, and special-interest publications, with supporting documentation in the form of detailed description, reviews, endorsements, and a financial analysis based on estimated costs and sales projections. The Council will evaluate each proposal and either approve the project, recommend further study or changes, or reject the project.

Authors should submit manuscripts directly to the Director, Smithsonian Institution Press. Copy and illustrations should be prepared according to general style and format instructions available from the Managing Editor. The Director will recommend publication subject to the availability of trust funds and to the approval of the Smithsonian Publications Council.

b. Direct mail Division. The Director of the Direct Mail Division will, after initial testing, submit proposals to the Council for general-interest books to be sold by direct mail to the Smithsonian Associates and to the book trade. The Council will evaluate each proposal and either approve the project, recommend further study or changes, or reject the project. Proposals must be approved in advance by the Director of the Press and will include an outline and prospectus for each project, together with a projection of expenses and sales income from direct-mail marketing and from the Press• book trade representatives.

4. OTHER SMITHSONIAN ORGANIZATIONS. Proposals for Smithsonian related publishing projects (by Smithsonian or non-Smithsonian authors) to be published and distributed independently by Smithsonian Institution organizations will be submitted to the Council by the sponsoring organization. All purchase orders and contracts related to publishing will be reviewed by the Printing Officer, SIP. Proposals will include documentation similar to the kinds mentioned in section 3 above, including endorsements from internal committees and plans for production, marketing, and distribution of the published work.

5. OUTSIDE PUBLISHERS. Proposals for works originating with Smithsonian Institution organizations and intended for publication by commercial or university presses should be submitted by the sponsoring organization to the Smithsonian's Contracts Office, which will provide for review by the Office of the General Counsel, and to the Council for final evaluation.

D. OUTSIDE PUBLISHING BY SMITHSONIAN AUTHORS

1. SUBSTANTIVE REVIEW. Smithsonian staff members who submit scholarly, scientific, and educational manuscripts to outside publishers are not required to submit these manuscripts for any internal review of the substance of the manuscripts. Smithsonian authors are urged, however, to engage in the professional practice of submitting such manuscripts to their colleagues for review before outside publication. In addition, a copy of the manuscript should be given to the author's organization unit head for his or her information.

2. PROCEDURAL REVIEW AND STANDARDS OF CONDUCT CLEARANCE. The scholarship of the Smithsonian staff can be freely published subject to the judgments of professional peers; however, staff members are required to discuss with and obtain clearance from their organization unit head and the Smithsonian ethics counselor for any publishing projects (including those that are scholarly or scientific) that might be considered related to their Smithsonian duties and responsibilities and in which they propose to engage with outside publishers. Articles that are to be published in scholarly journals for which Smithsonian authors receive no compensation are exempt from the clearance process.

"Clearance" involves review only of the publication process, for "standards of conduct" purposes, and not of the substance of the manuscript. (See OM 688, especially sections 7(c), 7(d), 7(e), and 12(b).)

3. OUTSIDE SCHOLARLY JOURNALS (including monographic series).

a. Page charges and reprints. Authors will negotiate directly with outside journals for publication of their articles and purchase of reprints. Before final arrangements are made, authors should contact their funds control officers. Reprint and page charges may be paid with federal, trust, grant, or contract funds by the author's ordering office--provided that the journal is not operated for profit and the page charge policy for the publication is administered impartially for government and non-government sponsored research reports. A proposal for a grant or contract should make specific provision for these costs in its budget. Federal funds may be used for page charges assessed by the journal to defray part or all of, the printing, for essential illustrations, and for a reasonable number of reprints for personal distribution (200 to 300). Federal funds may not be used to purchase reprint covers or to pay for abstracting or indexing.

To pay reprint and page charges, the author's ordering office should submit a form SI-4, "Requisition for Supplies or Services," to the Office Of Supply Services (OSS) through the Office of Accounting and Financial Services. OSS will then prepare the purchase order. All purchase orders related to publishing are reviewed by the Printing Officer, SIP.

b. Copies. After publication, authors should send two copies of their journal articles to Acquisition Services, Smithsonian Institution Libraries.



SMITHSONIAN DIRECTIVE 813,

July 9, 1986

PUBLIC INFORMATION PROGRAMS

1. Introduction

This Office Memorandum has been revised to reflect the added responsibility of the Office of Public Affairs (OPA) for reviewing press releases, promotional materials, and advertisements prepared by non-Smithsonian organizations in connection with Smithsonian activities and/or using the name of the Institution or any of its units.

2. Purpose

This Office Memorandum reaffirms policies guiding Smithsonian Institution's public affairs programs. It delineates the role of OPA regarding the news media and the coordination of public information policy for the central administration and with individual public affairs programs of bureaus and offices, and outlines the role of the Office of Visitor Services (OVS) regarding its responsibilities for assigned visitor and related public information activities.

3. Policy

The public shall be provided with prompt and accurate information about Smithsonian programs, policies, and activities. All information requests from journalists and from members of the general public shall be handled expeditiously in keeping with policy, good judgment, and with provisions described in this Office Memorandum.

4. Relationships

The directors of bureaus and offices are responsible for the development and management of public information programs appropriate to the purposes and activities of their organizations in accordance with policies outlined in this Office Memorandum. To meet the need for coordination of these many sources of information, OPA serves as a focus for the coordination of public informational policy in a manner that recognizes bureau responsibilities and prerogatives while representing Institutional interests and responsibilities. Responsibilities and activities of OPA are described in Sections 5 and 6 below.

OVS has a similar role to play regarding its major responsibilities in connection with visitor information and the handling of public inquiries. In the performance of this role, the Center functions in a cooperative relationship with OPA for the coordination of visitor orientation material as information services are outlined in Section 7 below.

5. Responsibilities of the Office of Public Affairs

OPA is responsible for the coordination of public affairs, publicity, promotional advertising and other information programs of the Smithsonian in conjunction with bureaus and offices, including execution of those programs assigned to it. OPA is further responsible for assuring that public communications are consistent with the Institution's principles and standards.

6. Functions and Activities

Specific responsibilities of OPA include the following:

- a. Coordination of Information Programs. It is the responsibility of all bureaus and offices to consult with the Director, OPA, concerning plans for programs that will or may affect public affairs activities and/or the Institution's reputation so that OPA can effectively coordinate such efforts and assure that they are consistent with Smithsonian policy.

OPA shall review advertising and promotional materials prepared by bureaus and offices in connection with exhibits or other activities, except as specified in OM 816 concerning auxiliary activities. Bureaus and offices planning exhibits or other events or activities involving outside organizations shall confer with OPA in advance and provide it with any public information, promotional or advertising materials prepared or proposed by such organizations for review prior to release.

- b. New Media Contacts and Inquiries. OPA is the office of primary responsibility for the dissemination of news and news feature materials to the communications media, including newspapers, magazines, books, radio, and television. OPA prepares and distributes information to the media on behalf of the Institution's central management. News releases, fact sheets, news features, radio, and television public service announcements and other materials prepared at the bureau or office level for the news media are to be routed for clearance through OPA.

NO LONGER IN USE

Smithsonian Directive 813,
07/09/86

Functions and Activities (continued)

OPA is also responsible for clearance of requests from the electronic or film media for coverage of news or news feature events and subjects at the Institution. Requests from the electronic and film media involving documentary or feature productions are to be referred to the Office of Telecommunications (OTC). Coordination and review of the latter requests are a subsidiary responsibility of OTC, whose primary responsibilities involve the coordination, review, and/or production of educational programming presented via film or the electronic media. OM 825, "Office of Telecommunications," provides a description of its purposes and functions.

Curatorial and other scholarly staff who receive queries from the communications media should confine their answers to areas of their subject specialty and advise their bureau's public affairs office or OPA of such contacts. Questions or requests of potential sensitivity or matters related to administration or policy shall be discussed with OPA before a response is made. Other staff shall refer news media queries to OPA or to the public information officer of the pertinent bureau.

- c. Public Information Brochures, Pamphlets, and related Publications. OPA produces general information materials summarizing Smithsonian programs and activities and is responsible for the coordination and review of such guides and other public information publications planned and developed for use of other bureaus and offices. Publications produced by OPA include "Smithsonian Institution Yesterday and Today," summarizing the Institution's history and major programs for a variety of audiences, and the "Welcome" brochure, a general brochure for the orientation of the museum visitor.

**Functions and
Activities
(continued)**

In its role as coordinator of public information programs, OPA also has responsibilities regarding bureau and office visitor orientation material, including building guides and related publications, a responsibility exercised in conjunction with OVS. To sustain high quality visitor information programs and to assure their general consistency in observance of Smithsonian standards for professionalism, accuracy, style, and clarity, bureaus and offices shall provide copies of visitor-oriented material sufficiently in advance of publication to OPA through OVS to allow for their consideration and clearance. Consideration of the content of visitor information publications shall be the primary concern of the Center's review, with matters of style, expression, and consistency with Smithsonian policies and editorial standards as the principal focus of review by OPA.

- d. Pan-Institutional Responsibilities. OPA is responsible for the preparation of pan-Institutional news and feature materials. Among its responsibilities in this area are the production for the monthly Smithsonian News Service, the preparation of generic or pan-Institutional radio and television public service announcements, the publication of a periodical reporting on research at the Smithsonian, the production of related materials and for the maintenance of associated services. The Office is responsible for preparation of news material relating to central administration activities, decisions, appointments, and announcements, and the Director, OPA, or designated deputy acts as spokesperson in response to inquiries concerning central administration matters. OPA endeavors, when staffing permits, to service the public affairs needs of bureaus and offices lacking information officers, and work with individual bureaus or offices in the production of radio and television public service announcements.

NO LONGER IN USE

Smithsonian Directive 813,
07/09/86

Functions and Activities (continued)

- e. Staff Information. OPA is responsible for publication of an internal newspaper on a regular basis to keep staff and other interested individuals and organization abreast of appropriate matters of interest.
- f. Public of Media Requests for Smithsonian Records. When requests for records or other information cite the Freedom of Information Act (FOIA), they shall be routed immediately to OPA for acknowledgement. The Office will evaluate each request, consult as necessary with the General Counsel, and coordinate with the knowledgeable bureau or office to assure appropriate action.
- g. Non-Smithsonian Organizations. The Director, OPA, is responsible for the review of all press releases, promotional materials, and advertisements prepared by non-Smithsonian organizations in connection with Smithsonian activities and/or using the name of the Institution or any of its organization units. See OM 816, "Advertising" for more details.

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NO LONGER IN USE

Smithsonian Directive 813,
07/09/86

Functions and Activities (continued)

7. Responsibilities of the Office of Visitor Services. OVS under the Assistant Secretary for Public Service, operates a range of central information and assistance programs serving the public, Smithsonian Associates, interns, volunteers, and staff.

Public-information-related functions and services include daily staffing and management of information desks in most Smithsonian museums, including an Associates' Reception Desk in the Smithsonian Institution Building. The Center Serves as the focal point for handling the Institution's public telephone and mail inquiries, produces two 24-hour recordings, Dial-A-Phenomenon and Dial-A-Museum, and prepares a variety of pan-institutional printed and audiovisual material for prospective and on-scene museum visitors. Other responsibilities include a summer Mall Information Program, daily slide/lecture visitor orientation programs, and information outreach activities with the local, national, and international tour and travel industry. OM 832, "Visitor Information and Associates Reception Center," provides details regarding the Center's purposes and activities.

Dean W. Anderson
Acting Secretary

CANCELLATIONS:

INQUIRIES:

FILING INSTRUCTIONS

RETENTION:

OM 735 dated 12/23/83

Office of Public Affairs

File this OM in numerical sequence with other current Office Memoranda.

Indefinite. Subject to review for currency 24 months from date of issue

NO LONGER IN USE



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 814,

November 2, 2011

SOCIAL MEDIA POLICY

I.	Purpose	1
II.	Background	1
III.	Scope	2
IV.	Roles and Responsibilities	3
V.	Definitions	4
VI.	Policy	5
VII.	Personal Social Media Activities	12
VIII.	Penalties	13
Appendix A: Administrative Procedures for Establishing Social Media Accounts		

I. Purpose

The purpose of this policy is to assist Smithsonian employees, interns, fellows, volunteers, research associates and contractors engaged in social media on behalf of the Smithsonian as part of their duties ("SI Social Media Participants") at all Smithsonian museums, research centers, offices and programs (SI units), including subordinate organizations, in understanding the legal, policy, and institutional implications of opening and maintaining social media accounts in an official capacity on behalf of the Smithsonian and SI units.

II. Background

Social media has become a vital tool for carrying out the Smithsonian's mission and strategic plan. However, the speed of dissemination and the informality of social media can also present legal risks as well as risks to the name and reputation of the Smithsonian if not handled responsibly. Social media, and the online environment generally, are rapidly changing; this policy is designed to reflect current practices for the prudent and effective use of social media, and will be updated periodically.

Online activity follows the same standards of conduct, policy directives, and oversight as offline activity. SI Social Media Participants have no expectation of privacy when participating in social

II. Background (continued)

media accounts opened or maintained in an official capacity or when Smithsonian computers and networks are used to engage in social media activities.

The Smithsonian has adopted several policies that apply to participation on social networking sites, including SD 931, Use of Computers, Telecommunications Devices and Networks; SD 950, Management of the Smithsonian Web; IT Security Policy; SD 103, Standards of Conduct; SD 609, Digital Asset Access and Use; Records Management Recommendations; and SD 215, Accessibility for People with Disabilities. Appendix A of this policy specifies the administrative procedures for establishing social media accounts in an official capacity on behalf of, and in the name of, the Smithsonian or SI units.

III. Scope

This directive applies to each SI unit or SI Social Media Participant who, in an official capacity and on behalf of the Smithsonian: (1) opens a social media account in the name of the Smithsonian; (2) posts Smithsonian content on a social media account opened in the name of the Smithsonian; (3) speaks or purports to speak on behalf of the Smithsonian on a social media account; or (4) is responsible for overseeing and maintaining an official Smithsonian presence on a social media site.

Important note about personal social media

activities: This policy is not intended to limit, restrict, or monitor personal social media activities outside of work, using personal computers and other devices. However, the line between public and private, personal and professional, is often blurred in social media. By using a Smithsonian title, identifying oneself as a Smithsonian employee or by other affiliation with the Smithsonian, stating or implying that one's statements are official or endorsed by the Smithsonian, or posting non-public Smithsonian content or other information acquired at work, the interests and reputation of the Institution are potentially affected. Therefore, Section VII of this policy applies to personal social media activities.

IV. Roles and Responsibilities

The Office of Public Affairs (OPA, part of the Office of Communications and External Affairs) establishes, maintains, and monitors the pan-institutional social media sites and, in conjunction with the SI units, periodically monitors selected social media sites established and maintained by the units and offices. Directors of units, offices and programs are responsible for ensuring that their social media sites comply with this policy. OPA also maintains a website, referenced in Appendix A, to provide current information on social media best practices, administrative procedures, metrics, and Smithsonian-approved social media sites.

The Office of the Chief Information Officer (OCIO) is responsible for maintaining the servers, storage, and backups that host social media activities within the Smithsonian information technology (IT) environment. As such, units must consult with the OCIO prior to launching internally hosted social media activities to ensure the future supportability and maintainability of these activities. Contact the OCIOHelpDesk@si.edu for assistance.

The Smithsonian Privacy Officer (SPO) is responsible for reviewing and approving the privacy policies of social media providers prior to the establishment of Smithsonian accounts on new social media sites, periodically reviewing the privacy policies of such sites to ensure compatibility with Smithsonian privacy policies, and working with the Office of General Counsel (OGC) to provide privacy training.

Directors of museums, offices, and programs are responsible for approving the establishment of social media accounts in the name of such museum, office, or program, for ensuring that those who establish the accounts notify OPA and Smithsonian Institution Archives (SIA) of the account and Social Media Point of Contact for that account, and for ensuring that those who, in an official capacity, establish and post content to such social media sites comply with the terms of this policy. Directors may delegate responsibility for social media to Web and new media staff or others who will be responsible for ensuring compliance with this policy.

IV. Roles and Responsibilities (continued)

The Office of Contracting and Personal Property Management (OCon&PPM) is responsible for reviewing and approving the contractual terms and conditions of social media sites as well as maintaining the [Approved Social Media Provider List](#) on a website referenced in [Appendix A](#).

The Smithsonian Institution Archives (SIA) is responsible for maintaining a current and complete SI Website and Social Network Registry of Smithsonian social media sites on a website, referenced in Appendix A, and for archiving information contained on such sites in accordance with applicable records management and retention policies and industry archival standards.

The Office of General Counsel (OGC) provides legal advice in connection with the establishment of social media sites and legal issues arising from the posting of content on such social media sites. The OGC also provides training in intellectual property, privacy, ethics, and related matters to those responsible for Smithsonian social media sites.

SI Social Media Participants are responsible for complying with this policy, other applicable SI policies, and for ensuring compliance with the contractual terms and conditions imposed by the specific sites on which they have opened accounts and for which they are responsible.

V. Definitions

The Social Media Point of Contact (Social Media POC) is the person who is designated by the director, or his or her designee, to notify SIA and OPA of the establishment of the account, is listed as the point of contact on the SI Website and Social Network Registry, serves as the point of contact for communications from OPA and SIA for the account, and closes social media accounts, when appropriate.

Approved Social Media Provider List is a current and complete list of social media providers whose terms and conditions and privacy policies have been reviewed

V. Definitions (continued)

and approved by OCon&PPM and the SPO. The [List](#) is maintained on a website referenced in [Appendix A](#). SI Social Media Participants may open new accounts with the providers on this list without seeking additional OCon&PPM approval.

Personally Identifiable Information (“PII”) is information about individuals maintained by the Smithsonian, including information which can be used to distinguish or trace an individual’s identity and any other information that is linked or linkable to an individual, such as medical, educational, financial or employment information. Examples of PII include, but are not limited to: (a) general personal data such as full names, maiden names, aliases, and full dates of birth; (b) address information such as street and email addresses; (c) personal identification numbers such as Social Security number, passport, driver’s license, taxpayer identification, financial account, and credit card numbers; (d) security information such as passwords, mother’s maiden names, etc.; and (e) personal characteristics that identify individuals, fingerprints, handwriting, etc., or biometric data such as retina scans, voice signatures, and facial geometry.

Social media is an umbrella term that encompasses websites that integrate technology, social interaction and content creation and dissemination. Social media includes a variety of forms such as blogs, wikis, photo and video sharing, podcasts, social networking, mash-ups and virtual worlds.

SI Website and Social Network Registry: A current and complete list of social media accounts opened by SI Social Media Participants, which is maintained by SIA. The Registry is maintained on a website referenced in Appendix A.

VI. Policy

Social media accounts should be used as part of a strategy for supplementing and enhancing content available on Smithsonian websites, reaching and engaging existing and new audiences, and carrying out the Institution’s strategic plan. SI units should consider

VI. Policy (continued) their mission-related goals, target audiences, staff and other resources, level of user engagement, comment moderation practices, means of measuring success and records management practices before opening and maintaining official Smithsonian social media accounts.

Social media accounts should not be used to create obstacles to public access to free Smithsonian content, which should continue to be posted on the primary Smithsonian websites when practicable. Once opened, social media accounts should be used and updated regularly, improved as needed, and evaluated periodically against the goals of the unit, program or office. When no longer used, social media accounts should be closed, with notice to the community as appropriate, and content should be archived or deleted, consistent with Smithsonian archival practices.

Once the decision is made to open and maintain a social media account in the name of the Smithsonian, such accounts must be established and maintained in accordance with the administrative procedures set forth in Appendix A and content-related principles set forth below. Once the account is established, all content posted by SI Social Media Participants must conform to the requirements set forth in subsection A below. In addition, subsection B contains recommended guidelines for official Smithsonian social media accounts. Subsection C provides requirements for overseeing and managing user-generated content that is posted on official Smithsonian social media accounts.

A. Requirements for Smithsonian-Posted Content on Social Media Sites. The following conditions apply:

- Content must not be posted that is unrelated to the Smithsonian mission, partisan or political, personal, contains personal attacks, is abusive, threatening, unlawful, harassing, discriminatory, libelous, obscene, false, or pornographic, infringes on the privacy or other rights of any third party, or otherwise falls within the prohibited categories set forth in SD 931, Use of

VI. Policy (continued)

Computers, Telecommunications Devices and Networks;

- Prior to posting content on Smithsonian Social Media sites, each SI Social Media Participant is responsible for ensuring that the content is free and clear of any restrictions, as set forth in SD 609, Digital Asset Access and Use, and for checking necessary provenance and other related records that might indicate restrictions.
- Content with known restrictions, such as copyright, trademark, privacy, contractual, or other restrictions as set forth in SD 609, Digital Asset Access and Use, must not be copied and posted on Smithsonian social media accounts; however, if such content is lawfully posted on a third party's social media site, linking from Smithsonian social media sites to such third-party site is permitted. For questions about restricted content, consult OGC prior to posting;
- For content the Smithsonian does not own or have permission to use, is not in the public domain, or, when the posting does not satisfy the fair use test under copyright law, permission must be obtained from the rights-holder(s) before posting third-party content on a Smithsonian social media site. For questions about copyright law, contact OGC;
- For content that requires prior permission from a rights-holder to be posted (e.g., under the terms of a contract, license, or release), the SI Social Media Participant must maintain a retrievable record of the clearance process;
- Content must not be posted that is confidential, proprietary, pre-decisional, internal, or otherwise not intended for public dissemination, including but not limited to financial information;

VI. Policy (continued)

- Political or religious messages or endorsements of political parties, candidates or groups, or comments that might be construed as lobbying must not be posted;
- Express or implied endorsements of non-Smithsonian products, services or entities, including contractors and their products and services, are not permitted;
- Recognition of donors and sponsors and the inclusion of sponsorship benefits, such as cause-related marketing, is only permitted in accordance with an approved sponsorship agreement (contact the Office of Advancement for assistance);
- Advertising and promotion of third parties and their products or services are permitted on Smithsonian social media sites only in accordance with SD 950, Management of the Smithsonian Web;
- E-commerce and sales of Smithsonian merchandise are permitted on Smithsonian social media sites to the same extent as on Smithsonian websites;
- Content must not be posted if it violates a person's privacy or includes personally identifiable information ("PII"), unless (a) prior consent has been obtained from the owner of PII; (b) the information is posted automatically when certain social media sites are used, such as a Twitter alias or an image and name that appear in conjunction with Facebook postings; (c) an artist's name, year of birth, and other publicly available information is posted in connection with SI exhibitions, programs and activities; or (d) the posting is otherwise consistent with Smithsonian privacy policies and practices. For questions about posting PII, contact the Smithsonian Privacy Officer at privacy@si.edu;

VI. Policy (continued)

- Photographic images of adult members of the public may be posted for non-commercial use if: (a) the image consists of a crowd shot in a public place; (b) the subject(s) featured prominently in the image have granted written consent to use the image; (c) the images were taken at an event that provided conspicuous notice through signage or public announcements to the public that photographs would be taken and used publicly; or (d) the subjects are deceased;
- Photographic images of recognizable children who appear to be under age 18 should not be posted unless a parent and/or guardian has given written consent to post the image; in consultation with OGC, exceptions may be justified for non-commercial use of crowd shots in which children are present;
- Calls for entries, contests, give-aways, or sweepstakes on social media sites require prior review by OGC if a tangible prize will be awarded; and
- Links from Smithsonian social media accounts to third-party websites shall conform to the linking rules set forth in SD 950, Management of the Smithsonian Web.

B. Recommended Guidelines for Smithsonian-Posted Content on Social Media Accounts

- The tone of Smithsonian social media accounts should be professional, dignified, and respectful. A conversational and friendly tone is permissible and encouraged. Spelling and grammar should be correct, unless the specific type of social media (e.g., Twitter) uses a different convention such as abbreviations, acronyms, or alternative language formats. The tone should not be overly informal or use slang, jargon, profanity, or other language that is not in keeping with the dignity and reputation of the Smithsonian. Remember that an important purpose of social media activity is to add value to the name and reputation of the

VI. Policy (continued)

Smithsonian and everything published on an official Smithsonian account reflects upon the Institution;

- Content should be as accurate and reliable as possible; where content cannot be authenticated or confirmed for accuracy, or is preliminary or incomplete due to gaps in information or other circumstances, users should be informed of this;
- If a mistake is made, it should be corrected in an honest and transparent manner;
- Where appropriate, audience comments and questions should be addressed promptly; some comments or questions may require consultation with OPA, OGC or other Smithsonian units prior to preparing a response;
- If posted content is obtained from a source other than the Smithsonian, appropriate credit and attribution to the source of the content should be provided; other people's work should not be plagiarized or infringed;
- Where possible within the established community practices of third-party social media providers, Smithsonian content should be posted with descriptive information, such as creator names, date, any applicable restrictions, and, for Smithsonian content, identity of holding unit and contact information;

C. Requirements for User-Generated Content on Smithsonian Social Media Accounts:

- When a social media account under the operation and control of the Smithsonian invites user comments and content, such account shall notify users that, among other things, their comments may be monitored, content may be removed, and their activity on the account is subject to the Smithsonian's terms of use and privacy policy. Sample notice language is

VI. Policy (continued)

included in Appendix A and may be incorporated into the social media account directly or the notice may be provided by a link to www.si.edu/termsfuse;

- **For all official Smithsonian social media accounts, whether hosted on si.edu or operated and controlled by a third party (e.g., Facebook),** each SI Social Media Participant is responsible for (a) actively monitoring all user-generated content at intervals determined appropriate by the Smithsonian unit, program or office in accordance with the applicable community guidelines, but not later than one business day after posting; (b) deleting content that violates the Smithsonian's posted comment policy (www.si.edu/termsfuse#/user-gen); (c) responding to questions; and (d) engaging the community in ways appropriate to the purpose, terms, and conditions of the site. If questions arise about user-generated content, contact OGC.
- All PII received from social media users must be treated in a manner that is consistent with applicable Smithsonian privacy policies and procedures, as may be updated from time to time, and with the social media platform's terms and conditions and community guidelines. If questions arise, contact the Smithsonian Privacy Officer at privacy@si.edu;
- For third-party sites on which the Smithsonian maintains a presence and which make user activities, preferences, or affiliations available to the Smithsonian based on a site-viewing relationship (e.g., "fans," "friends," or "followers"), the site should not be used by SI Social Media Participants to browse or collect personally identifiable information without the user's express consent.

VII. Personal Social Media Activities

Personal social media activities may be conducted on Smithsonian computers, telecommunications devices and networks only on an incidental and occasional basis, provided such activity does not interfere with the conduct of normal Institution business and meets the requirements of SD 931, Use of Computers, Telecommunications Devices and Networks. Official email addresses may not be used to set up a personal social media account. However, employees and others covered by this policy may use their official title, Smithsonian affiliation, or official email address for mere professional identification or biographic data on a personal social media site (e.g., LinkedIn or Facebook) consistent with the requirements of SD 103, Smithsonian Institution Standards of Conduct.

When publishing content to a personal social media account, employees and others covered by this policy must avoid stating, implying, or creating the impression that they are speaking in an official capacity on behalf of the Smithsonian or that their activity is endorsed by the Smithsonian. When posting comments that pertain to the Smithsonian, an effective way of distinguishing personal views from matters that fall within Smithsonian duties is to include a disclaimer in connection with personal social media activities, to make it clear that the views expressed are personal views and not those of the Smithsonian.

Further, employees and others covered by this policy, who are acting in their personal capacity must not disclose information derived from Smithsonian employment that is privileged, confidential, private, sensitive, non-public, pre-decisional or in violation of any rights, such as copyright. See SD 103, Standards of Conduct, for more information in this area.

Anonymously posting information about the Smithsonian is strongly discouraged, as are using pseudonyms or false screen names. With all social media activities, and regardless of whether acting in a personal or professional capacity, use common sense and good judgment: It is best to assume that comments and other postings will become public regardless of whether they are intended to remain private.

VIII. Penalties

Penalties for violations of this policy may include closure of a social media account, personal disciplinary action up to and including suspension without pay and termination of employment administered in accordance with Smithsonian personnel policies and procedures. Illegal activities will be reported to law-enforcement authorities for prosecution and punishment as provided by law.

CANCELLATION:
INQUIRIES:
RETENTION:

Not applicable.
Office of Communications and External Affairs (OCEA)
Indefinite. Subject to review for currency 24 months from date of issue

August 10, 2011

ADMINISTRATIVE PROCEDURES FOR ESTABLISHING SOCIAL MEDIA ACCOUNTS

A. Prior to Establishing an Account: Administrative Steps.

- SI Social Media Participants desiring to establish an official social media account first must obtain the approval of a direct supervisor to confirm that the SI Social Media Participant is authorized to spend official time on social media activities, to open the social media account, and to serve as the Social Media Point of Contact (POC) for that account.
- Upon approval by the direct supervisor, the SI Social Media Participant must obtain approval to open an official social media account by the director of the SI unit or such staff to whom the director has delegated approval authority for social media activities within the SI unit.
- Once approved, **if the account is to be hosted internally**, SI units must consult with the Office of the Chief Information Officer (OCIO) prior to launching to ensure future supportability and maintainability of these activities on SI servers.
- Once approved, **if the account is to be hosted externally**, the SI Social Media Participant must check the [Approved Social Media Provider List](#), once available on SharePoint, and maintained by the Office of Contracting and Personal Property Management (OCon&PPM) to determine whether the social media provider has been approved for use by the Smithsonian.
 - If the desired social media provider is not listed on the [Approved Social Media Provider List](#), the SI Social Media Participant must send the provider's "terms of use" and "privacy policy" to OCONHelp@si.edu and the Smithsonian Privacy Officer (SPO), at privacy@si.edu, for approval. New providers not already included on the [Approved Social Media Provider List](#) must be approved by OCon&PPM and the SPO before the Participant can accept the terms of the click-through license. If changes are needed to the provider's "terms of use" and "privacy policy," OCon&PPM will negotiate such revisions. OCon&PPM shall identify Smithsonian

Institution Archives (SIA) as the point of contact on any terms of service negotiated with a social media provider. Upon approval of new social media providers, OCon&PPM will update the [Approved Social Media Provider List](#) and notify SIA and the Office of Public Affairs (OPA). SIA will record the new account in the Social Network Registry maintained by SIA at <https://collab.si.edu/sites/OUSFA-SIA/SIA/webregistry/Registry%20Wiki/Social%20Media%20Providers.aspx>.

Remember: click-through licenses required by social media providers are contractual agreements and most Smithsonian employees do not have contracting authority to execute such licenses without prior approval from OCon&PPM.

- If the desired social media provider is already listed on the [Approved Social Media Provider List](#), the SI Social Media Participant must notify OPA and SIA by email of the proposed new social media account, including the name of the Social Media POC for that account, but prior approval is not required to establish an account with a provider that is already listed. In the event that the Smithsonian has negotiated terms of service with this social media provider, SIA shall contact the provider to add this new account to the negotiated terms of service.
- When notified of a proposed new social media provider or account, and the Social Media POC for that account, OPA will provide the Social Media POC with guidance, including the resources available on the SharePoint website to enable the Social Media POC to review best practices and collaborate with other SI Social Media Participants throughout the Institution. SIA will provide the SI Social Media POC with a link to the SI Web and New Media Listserv, to enable the Social Media POC to collaborate on matters related to social media at the Institution.
- SI Social Media Participants designated by their supervisor as a Social Media POC for specific social media accounts will be responsible for establishing, overseeing, maintaining, and closing the social media account for which that Social Media POC is responsible, and for providing the required notices to OPA and SIA.

Supervisors of SI Social Media Participants must ensure that the Social Media POC and all other SI Social Media Participants have reviewed this policy, the [Approved Social Media Provider List](#) and the SI Website and Social Network Registry maintained by SIA, and that they are familiar with, and able to identify, applicable content-based restrictions.

- SI Social Media Participants responsible for posting and maintaining content on social media accounts should obtain training on social media and related legal and policy issues offered by the Office of General Counsel (OGC) (<http://prism.si.edu/ogc/>), OPA and the SPO.
-

B. Prior to Establishing an Account: Naming the Account.

- Only OPA is authorized to establish pan-institutional accounts in the sole name of the “Smithsonian Institution” or “Smithsonian” without reference to a particular SI unit.
 - Authorizing supervisors or SI unit directors, as SI unit policy determines, who establish an account on behalf of an SI unit must ensure that the account’s name and/or other identifying information clearly identifies the SI unit’s official name and, where appropriate, the Smithsonian sunburst. If inclusion of the SI unit’s official name or Smithsonian sunburst is not feasible depending on the platform (e.g., Twitter), a link to the SI unit’s website is acceptable. If the name will incorporate the Smithsonian’s name and sunburst logo, it must comply with the Visual Identity Program, SD 104, unless OPA approves a variation.
 - Any program or activity that establishes an account must make its affiliation to the Smithsonian clear either through use of the program or activity’s official Smithsonian name and/or the Smithsonian sunburst, where appropriate and feasible, depending on the platform. If inclusion of the program or activity’s full name or Smithsonian logo is not possible, a link is acceptable. If the name will incorporate the Smithsonian’s name and sunburst logo, it must comply with the Visual Identity Program, SD 104, unless OPA approves a variation.
-

C. Setting up the Account:

- The account should be set up as an institutional account in the name of the SI unit, as appropriate (see section B above), except:
 - If the site only permits individual accounts rather than institutional accounts: an account may be opened by individuals acting in their official capacity, using a Smithsonian-provided “outlook resource account” (i.e., help@si.edu), and using Smithsonian computers; such accounts will be deemed institutional accounts.

- For Facebook pages, where the site prohibits an individual from opening more than one profile, approved SI Social Media Participants may use their personal Facebook profile as an administrator for an official Smithsonian page.
- SI unit directors or their designees may approve Twitter accounts set up in the name of specific employees or mascots (e.g., <http://twitter.com/suethetrex>) rather than the name of the SI unit; however, official accounts in the name of individual employees are generally discouraged.
- If the site does not permit staff to sign in or register using a Smithsonian-provided “outlook resource account,” but instead requires registration and sign-in using a specific social media account [e.g., Flickr only permits log-ins using a yahoo account (name@yahoo.com), google account (name@gmail.com) or a Facebook account], before opening the social media account that the SI Social Media Participant will use to log in or register with the social media platform, the Social Media Participant should contact OCon&PPM and the SPO for review and approval of the Terms and Conditions and Privacy Policy for that social media account. This is important because the social media account (e.g., gmail.com or Facebook) may be subject to different rules than the social media platform (e.g., Flickr). If OCon&PPM and the SPO approve the provider’s terms, conditions and privacy policy, the SI Social Media Participant, acting in his or her official capacity and using Smithsonian computers, may open an account; such accounts will be deemed institutional accounts.
- The social media account and SI unit websites should link to each other to guide people to resources and information available on the SI unit’s website and reinforce the official nature of the account.
- If the social media site has multiple SI units participating, and cross-linking is an available feature on the site, good-faith efforts should be made to cross-link with other related SI units.
- Social media accounts must link either directly to the Smithsonian’s terms of use and privacy policy on www.si.edu or to the SI unit’s main website, which in turn must link to the Smithsonian’s terms of use and privacy policy, if the social media site permits such links. If the social media provider does not allow posting of, or linking to, the Smithsonian’s privacy policy and terms of use, the SI unit must contact the SPO for further guidance. The SPO, in coordination with OCon&PPM, will determine whether the social media provider’s terms

of use and privacy policies are consistent with the Smithsonian's policies and that the user is aware of the policies applicable to the specific site.

- The following comment policy should be posted directly on all third-party social media accounts or, if a particular site does not allow direct posting, the social media site must link to the terms of use at <http://www.si.edu/Termsfuse>:

Be aware that [NAME OF WEBSITE] is a third-party website with its own terms of use and privacy policy. The Smithsonian does not control [NAME OF WEBSITE]'s collection, use, or dissemination of information. To protect your privacy and the privacy of others, do not include any personally identifiable information that you do not wish to be made available to the general public. In addition, the Smithsonian may archive materials posted on this website pursuant to its document retention policies. By posting content, you are giving the Smithsonian and those authorized by the Smithsonian permission to use or modify it for any educational, promotional, or other standard museum purpose, in media of all kinds whether now known or later developed. Any data that users post on this site or that the Smithsonian collects from this site is subject to our terms of use and privacy policies which can be found at: <http://www.si.edu/termsfuse/> and <http://www.si.edu/privacy/>. The Smithsonian also monitors posts on [NAME OF WEBSITE] consistent with its policy at <http://si.edu/Termsfuse#/user-gen>, and reserves the right to remove content in accordance with its Terms of Use.

- If the standard terms and conditions or privacy policy that apply to a particular social media site are not sufficient to cover the terms and conditions of use of the Smithsonian's content on that site, the SI unit should, in conjunction with OGC and SPO, as appropriate, develop supplemental rules.
- To open an account that requires payment, a unit may use a purchase card, purchase order, or requisition, as appropriate based on payment terms and applicable delegations of authority. If the SI unit needs assistance with determining how to pay for the account, contact OCon&PPM.
- Personal credit cards must not be used to open accounts, and any account opened with a personal credit card must not use the Smithsonian name, logo, content, or email address. This restriction does not apply to units that do not use Smithsonian purchase cards.

D. Archiving the Account

- Social media accounts maintained by the Smithsonian may be crawled or copied, in whole or in part, by SIA for permanent retention and preservation subject to policies established by SIA.
-

E. Closing or Abandoning an Account

- Accounts that are no longer intended to be used should be closed by the Social Media POC for that social media account and the user community should be notified, as appropriate, of the termination of the social media site;
 - Inactive accounts not used regularly for a year or more should be closed by the Social Media POC for that account or, if not, by the Social Media POC's supervisor, unless there is a reasonable basis to maintain the account for use at a later time;
 - Before closing or abandoning a social media account, the Social Media POC shall notify SIA and OPA;
 - Before closing an account, the Social Media POC shall work with SIA to archive or delete the content, as required by policies established by SIA;
 - All registered domain names must be held for 10 years in accordance with SD 950, Management of the Smithsonian Web.
-



SMITHSONIAN DIRECTIVES TRANSMITTAL

May 6, 1992

TO: Heads of organization units

SUBJECT: OM 756(R), Policies and procedures covering OPPS
photographic sales and the processing of permission
requests by OPPS - Revised Edition

Office Memorandum 756 has been revised to:

- a. Address the handling of public inquiries about the sale of photographs from images held in the OPPS Photographic Library;
- b. Reflect the granting of publication permission to the public for the use of OPPS photographic images; and
- c. Establish policies and charges for OPPS photographs and services provided to the public.

Please replace all earlier issuances of OM 756 with the attached revision.

: enfield
Assistant Secretary for
Finance and Administration

CANCELLATIONS: All earlier issuances of OM 756.
INQUIRIES: Office of Printing and Photographic Services
RETENTION: Indefinite. This OM is subject to review for
currency 18 months from the date hereof.
FILING: File this OM in numerical sequence with other
INSTRUCTIONS: current Office Memoranda.
COPIES: Copies of this Office Memorandum may be obtained
through the Office of Financial and Management
Analysis.



Smithsonian ON

OFFICE MEMORANDUM 756(R)

May 6, 1992

Policies and Procedures covering OPPS
Photographic Sales and the Processing
of Permission Request by OPPS

This office memorandum presents policies and procedures covering Office of Printing and Photographic Services; (OPPS)', photographic sales and the processing of permission requests by OPPS.

1. AVAILABILITY OF PHOTOGRAPHS. Photographs produced by the Office of Printing and Photographic Services, (OPPS) or stored in the OPPS Photographic Library are available for purchase by the public subject to the following conditions:

- A. The unit for whom a photograph was taken may declare it to be "Restricted" from distribution outside that unit. Photographs are normally restricted because of copyright or trade mark considerations, because the photograph is part of a "work in progress" (an exhibit or book currently under preparation) or because the object depicted is not the property of the Smithsonian.
- B. OPPS will coordinate with other Smithsonian units regarding the sale of photographs taken by OPPS for them.
- C. The sale of photographs taken by OPPS for OPPS projects (historic documentation of events, etc.) is handled solely by OPPS.
- D. Publishers must obtain additional permission before publishing photographs obtained through OPPS (See Exhibits A & B). OPPS follows the general Smithsonian guidelines contained in OM 707, Handling Outside Permission Requests to Use Smithsonian Images, for obtaining such clearance.

2. SERVICES BRANCH RESPONSIBILITIES. The OPPS Services Branch is responsible for providing services outlined in this OM. These include:

- A. Handling the sales of OPPS photographs to the public. Exhibits C & D outline specific services which are available, their related costs and sample order forms.
- B. Establishing and publishing a price list, as shown in Exhibits B and D, containing product and services which are available. OPPS reviews these prices on a regular basis and updates them periodically as needed.

C. Handling and coordinating requests from outside publishers for permission to reproduce OPPS photographs. Where photographs are from Smithsonian sources other than OPPS, the unit providing the photographs must handle permission requests from publishers.

D. Responding to customer requests for photographs of copyrighted or restricted materials. In these cases, services include furnishing the customer the name of the person or unit which can provide permission. OPPS will not sell or release restricted photographs without such permission.

E. Coordinating as needed the sale of photographs and the granting of publication permission with the Office of Product Development and Licensing, and the Office of the General Counsel.

F. Requiring the publisher or author to furnish to the Smithsonian Institution at no cost two copies of the publication in which the Smithsonian Institution photographs appear. These copies will be for the use by the SI Libraries and for reference files in the offices, divisions or bureaus concerned.

3. GENERAL POLICIES.

A. If the income level from the sales or other fees permits, OPPS will share revenues with offices, divisions or bureaus for whom the photographs were taken.

B. Heads of organization units and members of the professional research staff, with approval of the head of their unit, may give or lend a limited number of photographs to professional colleagues and cooperating individuals or organizations for nonpublication research use. In these cases, such photographs will not be ordered through the Services Branch. SI Form-800 work order procedures are used to order these photographs.

C. OPPS may waive fees for outside customers and publications when to do so is clearly in the interest of the Smithsonian Institution.

D. Photographs for distribution to publications in conjunction with Smithsonian publicity or promotional activities are not covered by this OM. Such photographs are

requested through a public affairs office using SI Form-800 work order procedures.

E. Original negatives, slides, transparencies, and related materials produced by OPPS are the property of the Smithsonian Institution. OPPS maintains all originals under archival conditions in the OPPS Cold Storage facility. Materials delivered to customers under this OM will be duplicates.

F. OPPS will stamp all prints they produce "REPRODUCTION PROHIBITED WITHOUT WRITTEN PERMISSION, SMITHSONIAN INSTITUTION, WASHINGTON, DC 20560."

G. Smithsonian employees and associates will normally pay for photographs for their personal use. Employee and Associate discounts will apply.

4. RELATED INFORMATION CONCERNING PHOTOGRAPHIC MATTERS.

A. The Smithsonian Institution Press is responsible for requests from outside publishers to acquire and/or reproduce photographs previously published by the SI Press. See OM 707, for further information.

B. The Office of Public Affairs has responsibilities for releasing information to the news media and for ordering, preparing and clearing photographs used for publicity or related purposes. See OM 735, Public Information Office, for further information.

C. OM 724, Use of Smithsonian facilities for special events, contains policy concerning photographic coverage of special events and the distribution and purchase of photographs of these affairs.

SMITHSONIAN INSTITUTION
Office of Printing and Photographic Services
Customer Services Branch Washington, D.C.
20560

PERMISSION REQUEST

Please complete Section A, sign, and return the original and two copies of this form to Customer Services Branch, Office of Printing and Photographic Services, Smithsonian Institution, Washington, D.C. 20560. Send no money with this application. When countersigned by officials of the Smithsonian Institution one copy will be returned to you.

SECTION A--Customer completes		From: _____	
		Name of Person or Organization _____	
Permission is herewith requested to use the following photographic materials from the Smithsonian Institution:			
Negative/Slide #	Description		
_____	_____	_____	
_____	_____	_____	
_____	_____	_____	
_____	_____	_____	
For publication in: _____			
		Title of publication	Edition
Type of publication or other use: _____			
Estimated date of publication _____			
Author _____		Publisher _____	
Address _____		Address _____	
City & State _____	Zip _____	City & State _____	Zip _____
Country _____		Country _____	
Telephone _____		Telephone _____	
All conditions of SIFL-2940a, "Reproduction Terms and Fees," will be adhered to unless otherwise specified in writing by the Customer Services Branch, Office of Printing and Photographic Services, Smithsonian Institution.			
Signed _____		Title _____	
Organization _____		_____	
Address _____		City & State _____ Zip _____	
Date signed _____		Telephone _____	
SECTION B-Responsible Curator or unit head completes		Permission is granted to the above for the described use. Restrictions on use: _____	
_____		_____	
Unless otherwise specified below, each reproduction shall bear the credit line: Smithsonian Institution Photo No. _____			
Other credit line required in lieu of above: _____			
Approved _____		Date _____	
Unit Head or professional research staff member _____			
Organization Unit _____		Cost Control Center # _____	
SECTION C--Customer Services Branch, OPPS completes			
Approved _____		Date _____	
Chief, Customer Services Branch, Office of Printing and Photographic Services, Smithsonian Institution			
CSB-OPPS Permission No. _____			

SMITHSONIAN INSTITUTION
Office of Printing and Photographic Services
Services Branch
Washington, D.C. 20560

Reproduction Terms and Fees
Effective March 4, 1992

Photographs obtained through the office of Printing and Photographic Services, the negatives of which are in the care of or are the property of the Smithsonian Institution, shall not be reproduced, resold, or otherwise commercially used without the specific permission of the Smithsonian Institution. Use form SI-2940, "Permission Request," to submit your request for reproduction permission.

RESTRICTIONS AND LIMITATIONS. No photographic materials supplied from the Smithsonian Institution may be used to show or imply that the Smithsonian endorses any commercial product or enterprise, concurs with the opinions expressed in, or confirms the accuracy of any text used with these photographs.

FEES. Fees for reproduction rights to photographs obtained through the Office of Printing and Photographic Services (OPPS) are determined by OPPS. However, the Smithsonian reserves the right to prohibit the use of photographs in any request or project. Requests from outside publishers to acquire and/or reproduce photographic materials previously published by the Smithsonian Institution should be directed to the Smithsonian Institution Press.

COPYRIGHT. Smithsonian photographs are obtained from many sources and are intended primarily for research and educational purposes. Certain photographs may require additional approval from the original copyright owners. You will be advised of any such restrictions when your form SI-2940, "Permission Request," is processed.

CREDIT LINES. All photographs should be given a credit line, preferably at the picture's edge, or in the case of filmstrips, in the accompanying brochure. Unless otherwise specified, please credit: Smithsonian Institution Photo No. _____, By (Name of Photographer).

DISPOSITION OF PICTURES AFTER USE. All purchased pictures may be retained in your files or returned to the Smithsonian after use. Subsequent use of these photographs is restricted and requires additional permission authorization.

REQUIREMENT FOR COPIES OF PUBLICATIONS IN WHICH SMITHSONIAN PHOTOGRAPHS APPEAR. As part of the agreement to grant reproduction permission, the Smithsonian requires that, immediately upon publication, ~~to~~ copies of the publication be furnished at no cost to the address below for use in our library and division files.

ADDITIONAL INFORMATION. Additional information and rates may be obtained from Services Branch, Office of Printing and Photographic Services, Smithsonian Institution, Washington, D.C., 20560, Telephone (202) 357-1933 or 357-1803.

Customer, complete only Section C of this form; please type or print-write numbers carefully.

<div style="border: 1px solid black; padding: 2px; display: inline-block;">SECTION A</div> <div style="margin-left: 10px;">SI Curatorial or Organization Use Only</div>		<div style="font-size: 4em; font-weight: bold; margin-bottom: 10px;">O</div> <div style="font-weight: bold; margin-bottom: 10px;">SMITHSONIAN INSTITUTION PHOTO ORDER</div> <div style="font-size: 0.8em;">Smithsonian Institution Photographic Services Museum of American History, Room CB-051. 14th & Constitution Ave. NW Washington, DC 20560</div>																																																																																																																																																																																			
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<div style="border: 1px solid black; padding: 2px; display: inline-block;">SECTION B</div> OPPTS USE ONLY Rec'd by _____ Date _____ Comments: _____		<div style="border: 1px solid black; padding: 2px; display: inline-block;">SECTION C</div> CUSTOMER REQUEST NOTE: Reproduction rights-Photographs and materials on this order may not be reproduced without prior permission from the SMITHSONIAN INSTITUTION. Please supply the following information: Glossy prints are standard-please check here if matte is desired. The materials and services requested on this order are for reproduction or resale-Yes <input type="checkbox"/> No <input type="checkbox"/> If Section A of this form has not been completed please furnish the following information: Negative numbers and information on this order were obtained from _____ NOTE: This order form will be returned with your completed order. Additional information concerning your completed order will be found in Section E below. Information on policies and charges are contained in forms SH118A and S FL-2940-A.																																																																																																																																																																																			
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SI :IIIa
Rev 3/1/IIIi

SMITHSONIAN INSTITUTION
SERVICES BRANCH
OFFICE OF PRINTING & PHOTOGRAPHIC SERVICES
WASHINGTON, DC 20560
Phone 202-357-1933

PHOTOGRAPHIC POLICIES AND CHARGES, Effective March 1, 1988

This office offers the public the opportunity to purchase Smithsonian photographs which have been approved by curatorial units. If a negative of the photograph you need is not on file or available, many items in the Smithsonian Collections - with the approval of the responsible curator - may be photographed for you.

HOW TO ORDER All orders must be submitted using a Form SI-318, (Photo Order). These may be obtained from any curatorial unit or by mail.

PAYMENT AND MINIMUM CHARGES We cannot accept cash. Advance payment in the exact amount by check or money order is required. The minimum fee for any order is \$10. Your check or money order will be deposited upon receipt. It should be made payable to "Smithsonian Institution" in U.S. dollars issued through a U.S. bank. We suggest that corporations frequently using our services maintain cash advance accounts with this office to cover projected orders.

TERMS We will make every effort to insure that you receive the correct photographs. However, there are often duplicate negative numbers referring to photographs in different collections. Therefore, a complete description and negative number of each photograph should accompany your order. We cannot be responsible for errors where photographs are ordered by number only, or if the wrong number is ordered through an error occurring outside this office. Photographs are all custom printed to fill specific orders, and cannot be sent on approval or returned for credit. We do not retouch prints to eliminate existing imperfections including lines resulting from cracks in glass plates. If we are unable to provide a requested item, a refund will be issued. Due to the cost involved, however, refunds of \$10 or less will not be made unless specifically requested.

DELIVERY Four weeks from the time the completed order form and advance payment arrive at this office should be allowed for routine processing. Original photography, prints from glass plates, orders requiring copy negatives, and large orders may require longer. All orders are shipped postage paid via U.S. Mail unless otherwise specified. If use of a commercial courier service is preferred, we will ship collect using your account number.

REPRODUCTION RIGHTS AND LIMITATIONS Smithsonian photographs may not be reproduced without specific written permission from the Institution. If you anticipate publishing, exhibiting or other commercial use of these photographs, a Form SI-2940, (Permission Request), must be completed and approved by the Institution. These photographs shall not be used to show or imply Smithsonian endorsement of any commercial product or enterprise, or to indicate that the Institution concurs with the opinions expressed in, or confirms the accuracy of any text used with these photographs.

RESTRICTIONS AND LIMITATIONS Copyrighted or otherwise restricted materials may require additional clearance before they can be released. If copyright is held outside the Institution it is your responsibility to obtain any necessary releases.

ORIGINAL PHOTOGRAPHY Concern for the safety and handling of objects in the collections is a prime factor in determining if original photography can be taken for you. The decision to permit the photography of any object rests with the curatorial staff. When it is their opinion that sufficient photographs are on file, requesters will be limited to a choice from those already available.

COMMERCIAL PHOTOGRAPHY ON PREMISES NOT AUTHORIZED No photographs for advertising or any other commercial purpose may be taken on Smithsonian premises unless officially authorized.

CHARGES Effective
March 1, 1988 (\$10.00
Minimum Order)

PRINTS FROM EXISTING NEGATIVES

Black and White Prints

8" x 10" or smaller.	\$10.00
11" x 14	\$15.00
16" x 20"	\$20.00

Color Prints

8" x 10" or smaller.....	\$25.00
11" x 14".....	\$40.00
16" x 20".....	\$65.00

SEPIA TONE AND SPECIAL PROCESSING
100% surcharge of unit price

SLIDES AND TRANSPARENCIES

35mm duplicate of existing color slide (2" x 2")	\$5.00
35mm B&W slide from existing B&W negative	\$5.00
35mm color slide from original manuscript or art work	\$15.00
4" x 5" duplicate color transparency	\$30.00
4" x 5" B&W duplicate or copy negative	\$25.00

ORIGINAL PHOTOGRAPHY

Photographer's rate per hour or fraction thereof. \$50.00
(Payment of the hourly rate does not grant you exclusive rights or automatic reproduction privileges.)

When ordering new photographs taken, send fee for one hour plus price of photographs. You will be notified prior to work being performed if our estimate exceeds this amount.

RUSH PROCESSING

Because of a limitation of lab time and personnel, ALL RUSH ORDERS MUST RECEIVE PRIOR APPROVAL THROUGH THIS OFFICE. Call (202) 357-1933.

Rush Processing- (Guaranteed processing time of one work week)- 100% surcharge of total order.
Overnight Rush - 200% surcharge of total order.

RUSH requests which have not received prior approval from this office may be returned to you, thereby delaying eventual delivery.

RESEARCH

In general, all research to determine negative numbers must be coordinated with the curatorial staff by the individual placing the order. However, this office can occasionally provide limited research by advance arrangement.

Research rate per hour or fraction thereof.. \$50.00

NOTICE: Any order with insufficient information or payment will be returned. Please double-check your negative/transparency numbers and include a description of each to insure the correct photograph has been ordered. All orders are custom processed and photographs cannot be returned or refunds made where the wrong number is ordered.

EDUCATIONAL DISCOUNTS Student., teachers, Smithsonian Associates and nonprofit educational institutions may request a 10% discount. Advance payment must be accompanied by your Associates number or a short statement on your school or institution stationery specifying, (1) your qualification for an educational discount and, (2) the purpose for which the pictures will be used. DISCOUNTS ARE NOT AVAILABLE ON ORDERS FOR COLOR PRINTS, RUSH OR SPECIAL PROCESSING.

QUANTITY DISCOUNT A discount is available on multiple prints of same negative. Prices are available upon request.



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 950,

April 20, 2012

MANAGEMENT OF THE SMITHSONIAN WEB

Purpose	2
Scope	3
Guiding Principles	4
Definitions	5
Roles and Responsibilities	7
POLICY	10
Content Development	10
• Unit Web Management Plans	10
• Domain Names	10
• Visitor Supplied Content	11
• Recognition of Sponsorship	11
• Links to External Websites	12
• Links from External Websites	13
• Site Assessments	13
• Smithsonian Web Portal	14
Security	14
• Payment Card Industry Data Security Standard	14
• Security Certificates	15
• Security Reviews	15
• Security and Performance Testing	15
Privacy	16
• Collecting Personally Identifiable Information	16
• Privacy Reviews of Personally Identifiable Information	16
• Children and the Internet	17
• Privacy Notice	17
• Tracking Technologies	18
• Visitor Communication Opt In/Opt Out	19
Terms of Use and Permission Restrictions	20
• Terms of Use Notice	20
• Use of Copyrighted and Restricted Material	20
• Release Forms	20
Accessibility	21

• Standard Plug-Ins and Web Applications	21
• Consideration for Visitors with Disabilities	21
• Search	22
• Metadata	22
• Portability of Information	22
• Usability of Data	22
Development and Maintenance	23
• Separation of Development and Production Environment	23
• Web Infrastructure Review	23
• Web Servers and Storage	25
• Common Web Development Tools	25
• Common Web Applications	25
• Contracts and Purchase Orders	25
• Donations of Software and Hardware	25
• Content Provider Contact List	26
Records Management	26
• Records Retention for Web	26
• Capturing Websites for Archival Purposes	26
Appendix A: Sample Notice of PII Collection by a Third-Party Site	

Purpose

All of the websites and Web applications of the Smithsonian Institution serve national and international audiences in broadening access to Smithsonian exhibitions, research, programs, staff, collections, and digital assets. The Smithsonian offers to the public opportunities to learn about its exhibitions, programs, research, and collections through its Web presence. The policies and procedures set forth in this directive were developed to ensure the integrity of our content, reliability of our Web infrastructure, and usability of our websites while protecting the privacy of our visitors and the reputation of the Institution through proper Web management practices.

Web management includes all the processes involved in building and operating an organization's Web presence. This includes managing content, applications, infrastructure, staff, and design; and following best practices, policies, and procedures

Purpose (continued) needed to maintain order and meet organizational goals. The development and maintenance of the Smithsonian Web presence is performed by Web practitioners across the Institution either as a primary or collateral duty or by third parties with whom the units contract to develop and maintain their sites. For purposes of this policy, units refer to museums, offices, and programs within the Smithsonian.

This directive establishes the framework of the Smithsonian's Web management policy; and assigns responsibilities for all involved in the development and management of Smithsonian public-facing websites — including managing content and applications, infrastructure, design, implementing best practices, and the policies and procedures necessary to protect the interests of the public and the Institution — to meet Smithsonian goals.

Implementation details are documented in the 950-series of Information Technology Technical Notes.

Scope This directive applies to all Smithsonian public-facing websites and Web and mobile applications, regardless of funding sources and whether or not they are hosted on Smithsonian servers.

It does not apply to internal websites not intended for the public (e.g., intranets such as Prism) or non-Smithsonian websites and applications on which the Smithsonian has chosen to place its content to broaden access to Smithsonian knowledge and digital assets (e.g., Flickr or Facebook). Smithsonian activities on social media sites are addressed by SD 814, *Social Media Policy*.

This directive does not apply to non-Smithsonian websites and applications in which the Smithsonian is a collaborator, such as the *Encyclopedia of Life*, or in situations where the Smithsonian is a service provider, such as Chandra's website operated by the Smithsonian Astrophysical Observatory (SAO) on behalf of the National Aeronautics and Space

Scope (continued)	Administration (NASA). Under these circumstances, written agreements with the collaborating entity or entities will take precedence even though they may be informed by this policy.
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Guiding Principles	<p>The guiding principles for Web management are as follows:</p> <ol style="list-style-type: none">1. Use the World Wide Web to help the Institution achieve its mission, vision, and goals. The Institution shall establish a world-class Web presence to enhance public outreach by providing online access to Smithsonian collections, exhibits, programs, research, and staff while employing practices that ensure the accuracy, integrity, and currency of its Web content.2. Maintain flexibility by allowing Smithsonian units to manage their Web content while also adhering to Smithsonian policies and benefiting from shared services. The creation of content for Smithsonian websites is the responsibility of individual Smithsonian units, with the directors of museums, research centers, and offices ultimately responsible for their organization's Web content. Units should leverage emerging Web technologies in their online exhibits to engage and draw visitors to Smithsonian collections and expertise. The Office of the Chief Information Officer (OCIO) is responsible for maintaining the Web infrastructure and providing technical guidance on current and emerging Web technologies in partnership with unit IT staff. The Office of Communications and External Affairs (OCEA) is responsible for maintaining SI.EDU and Smithsonian.org.3. Promote a common image of the Smithsonian to the public through the Institution's public-facing websites. Websites shall clearly be identifiable as belonging to Smithsonian units; they shall also use common themes, associations, branding, and visual identity.
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Definitions

Content includes text, audio, video, and images, as well as applications providing interactive services over the Web and through new media.

Home Page is the webpage that serves as the front door of a website.

Informational Websites, for the purposes of this directive, are webpages other than those that comprise an online exhibit or Web/mobile application. Informational websites often provide information about the Institution, its governance, museums, programs, research facilities, and research activities and findings.

Online Exhibits are exhibits that either complement an on-site exhibit or are a stand-alone virtual exhibit or run in a mobile application. Online exhibits may include a high usage of multi-media, plug-ins, and emerging Web technologies to entice and entertain while imparting knowledge.

Personally Identifiable Information (PII) is information about individuals maintained by the Smithsonian, including information which can be used to distinguish or trace an individual's identity and any other information that is linked or linkable to an individual, such as medical, educational, financial, or employment information. Examples of PII include, but are not limited to: (a) general personal data such as full names, maiden names, aliases, and full dates of birth; (b) address information such as street and email addresses; (c) personal identification numbers such as Social Security number, passport, driver's license, taxpayer identification, financial account, and credit card numbers; (d) security information such as passwords, mother's maiden name, etc.; and (e) personal characteristics that identify individuals, fingerprints, handwriting, etc., or biometric data such as retina scans, voice signatures, and facial geometry.

Smithsonian Public-facing Website is a website made available to the public by a Smithsonian unit, office, or program. The website is controlled by the Smithsonian; it may support collaboration with partners or accept user-generated content. The intended

Definitions
(continued)

audience is the public rather than Smithsonian staff. Social media sites such as Facebook or YouTube, containing Smithsonian content, are accessible from Smithsonian public-facing websites; however, they are not part of that website for purposes of this policy. Websites that the Smithsonian operates on behalf of a consortium or an independent organization are included in this definition only if they are hosted on Smithsonian-controlled Web servers and address audiences in addition to Smithsonian staff, in which case this directive will also apply to them.

Smithsonian Web Portal is the top level point of entry to the Smithsonian's Web presence, www.si.edu, and the second-tier pages linked directly from this page.

Technical Reference Model (TRM) identifies a comprehensive set of information technology (IT) standards, services, protocols, and products that define the target technical environment for the acquisition, development, implementation, and support of IT systems and infrastructure. It includes a list of "*Preferred Products*" — commercial application software packages, hardware, and software components that conform to the TRM target architecture. See technical standard and guideline IT-940-TN01, Technical Reference Model, for more information.

Web Application, for the purposes of this document, is either an application which gathers, stores, and processes user input through a Web interface; or which displays information on the Web generated in response to user input — excluding database-driven Web content. Web applications also include New Media applications with similar behaviors, such as smart phone applications.

Website is a set of interconnected webpages and applications that are intended by the site owner to be a collection of information accessed through a single site. This includes database-driven websites.

World Wide Web is a system of Internet servers that

Definitions
(continued)

support documents formatted in Hyper Text Markup Language (HTML) script, with links to other Web content.

Roles and Responsibilities

The **Office of the Chief Information Officer (OCIO)** is responsible for establishing technical standards related to the Web; designating preferred products for use in website design and content management; operating and maintaining Web infrastructure except for SAO and the Smithsonian Tropical Research Institute; maintaining connectivity to Internet 1 and Internet 2; registering Smithsonian domain names; updating the TRM; collecting usage statistics; and ensuring that computer security controls are in place.

The **Office of Communication and External Affairs (OCEA)** maintains the Smithsonian portal (SI.EDU and SMITHSONIAN.ORG top pages); ensures that the content and branding of all Smithsonian public informational webpages adhere to Smithsonian style guidelines when implementing the optional Smithsonian templates, and follow documented Smithsonian standards for website design and usability; regularly conducts surveys on www.si.edu to determine the reasons that people visit the website, their educational levels and occupational interests, their needs with respect to content, and their location; and maintains an online listing available to the public of contact information for each unit's rights and reproduction points of contact and the contact in the Office of Product Development and Licensing to be linked to from the Smithsonian's Terms of Use webpage.

Accessibility Program staff provide guidance to assist with designing and testing websites for accessibility.

Directors of Museums, Research Centers, and Offices are responsible for ensuring that all units within their organizations adhere to Smithsonian Web policies, and for ensuring the integrity of the content in unit websites and online exhibits. Directors may designate staff to assume day-to-day responsibility and approval of content.

**Roles and
Responsibilities**
(continued)

The **Office of Contracting and Personal Property Management (OCon&PPM)** will ensure that all contracts it awards to develop Web content incorporate compliance with this policy as a requirement in the successful delivery of a work product.

The **Office of Advancement (OA)/Office of Corporate Relations** approves recognition of corporate sponsorship and active links to sponsors' commercial or corporate enterprises from Smithsonian Web content, and provides guidance and coordinates online fund raising across the Institution.

The **Office of General Counsel (OGC)** provides guidance on the legal aspects of use of the Web by the Smithsonian; is responsible for updating, as warranted, the Smithsonian's standard website terms of use notice; makes determinations on requests to waive or modify these notices; and advises on content-based restrictions.

The **Office of Policy and Analysis (OP&A)** reports on external awards/recognition of the Smithsonian Web presence in thrice-yearly reports to the Board of Regents, and reports on the number of website visitor sessions in the annual performance reports.

Smithsonian Institution Archives (SIA) manages, preserves, and makes accessible the official and historical records of the Institution. It also provides records management services, including record disposition schedules for unit websites, Web applications, and online exhibits. SIA is the central repository for storing the historical snapshots of Smithsonian websites and related content.

Smithsonian Enterprises (SE) approves recognition of commercial sponsors and active links to commercial or corporate enterprises from Smithsonian Enterprises' Web content. SE will ensure that all contracts it awards to develop Web content incorporate compliance with this policy as a requirement in the successful delivery of a work product.

**Roles and
Responsibilities**
(continued)

The **Smithsonian Privacy Officer (SPO)** conducts privacy reviews of Smithsonian websites and Web applications — and websites and Web applications operated on behalf of the Smithsonian — that collect, maintain, or disseminate PII; provides general advice on privacy matters; and coordinates with OGC to provide legal advice on privacy issues.

Web Content Teams are formed to support the development and ongoing maintenance for specific websites and online exhibits. The composition of the team varies based on the needs of the effort and may include representatives from departments and divisions — representing relevant collections, research, education, exhibitions areas, and public affairs — as appropriate for the purpose of creating and reviewing Web content.

Web Management Offices are located in several larger units. Their primary responsibility is managing their unit's websites. The exact responsibilities of this office are defined by the unit's director, and may extend from basic Web content maintenance to website and applications development, the management of outsourced Web-related contracts, and policy, technical standards and strategic planning for the unit's Web-based outreach. The composition of staff in this office varies by unit (e.g., project manager, content manager, user experience designer, graphic designer, database administrator, editor, programmer/application developer). Web content development and review are generally coordinated by this office with the other divisions within the unit.

Web Practitioners are responsible for implementing and maintaining the Web content and/or Web infrastructure both in OCIO and throughout the Institution — including within unit Web Management Offices, if a unit has a Web Management Office.

POLICY

Content Development

Smithsonian units determine and develop the content of their websites consistent with the Institution's mission. This section describes:

- **Unit Web Management Plans**

Units with at least one public-facing website are required to develop and maintain a Unit Web Management Plan describing the procedures by which it produces and manages its Web content, and its review practices regardless of where the site is hosted.

New content — including significant updates or additions — shall be reviewed and approved consistent with the unit's written procedures prior to releasing it for public dissemination. The plan should be regularly updated as required to accurately address the level of detail warranted based on the scale and complexity of the unit's websites.

OCIO shall provide units with guidance on the development of these plans. Each unit's Web Management Plan will be approved by the unit director and submitted to OCIO. The website's Web practitioner and/or the unit's Web Management Office shall retain a copy of these plans.

- **Domain Names**

All new Smithsonian websites shall use the Smithsonian Institution domains of SI.EDU, SMITHSONIAN.ORG, SMITHSONIAN.MUSEUM, or SMITHSONIAN.COM, or such other top level domains as may be acquired and made available from time to time. Acquisition of new top level domain names for pan-institutional use shall be coordinated by the Office of Public Affairs (OPA) in OCEA, OCIO, and OGC. OCIO may grant exceptions to use other domain names for, but not limited to, e-commerce websites or websites created for tenant organizations or special projects, or with other non-profit organizations pursuant to a written agreement.

POLICY (continued)

Only OCIO is authorized to register and acquire domain names for the Smithsonian Institution, in consultation with OGC and OPA. All requests for new domain names or to acquire domain names from third parties — including the registration — shall go through this office unless this responsibility is delegated in writing from OCIO. OCIO will consult with OGC, as needed, in acquiring domain names from third parties.

When exceptions are granted to use a domain name other than one listed above, the Smithsonian units are responsible for paying these domain name registration fees, as applicable, for the duration of the time the domain names are needed, plus an additional dormancy period as set forth in OCIO Technical Note IT-950-TN02.

The OCIO and the OGC are responsible for responding to third-party misuse or infringement of the Smithsonian's domain names, and trademarks, and other forms of cyber-squatting, including efforts to prevent others from using domain names that create the appearance of being associated with the Institution.

- **Visitor Supplied Content (aka User-Generated Content)**

Refer to SD 814, *Social Media Policy*, when using Web technologies to host areas that allow visitor supplied content from the general public, such as blogs or message boards, and visitor comments.

- **Recognition of Sponsorship**

Recognition of financial or "in-kind" support through an active link to a sponsor's website or display of a sponsor's logo is only permitted in accordance with SD 809, *Philanthropic Financial Support*.

Units should contact their development office for guidance on recognizing corporate sponsorship. If a unit does not have its own development office, then it should contact the Smithsonian's OA for guidance.

POLICY (continued)

- **Links to External Websites**

Smithsonian websites may use external links consistent with mission goals, visitor needs, and Web community best practices to improve engagement with the public. Smithsonian units may link to third-party websites that are relevant and appropriate to the purpose of the Smithsonian webpage on which the link will appear. As a general rule, the Smithsonian does not allow links to third-party commercial sites that promote goods or services in a manner that can be construed as a Smithsonian endorsement of such goods and services, unless there is a programmatic-related reason as set forth below.

Links from Smithsonian websites may include, but not be limited to:

- a) Non-profit, non-governmental organizations, or educational websites, including schools and museums both domestic and foreign;
- b) Governmental websites, including United States, state and local levels of government, and foreign governmental websites;
- c) Official social media accounts maintained by the Institution (See SD 814);
- d) Certain commercial sites providing the software required for viewing Smithsonian websites, such as Adobe®;
- e) Vendors that offer products valuable to or necessary for visitors, such as ticketing agencies;
- f) Companies, organizations or associations with a contractual relationship to the Smithsonian, in which the contract provides for linking to/from Smithsonian websites in furtherance of a Smithsonian program or activity (e.g., Smithsonian Associates linking to an online book retailer where the book retailer sells a book necessary for a specific program and provides the Smithsonian with a fee for each purpose, or links to the Smithsonian's authorized product licensees);

POLICY (continued)

- g) Sponsors of Smithsonian exhibitions, programs, and activities, pursuant to a written sponsorship agreement, provided that links from the Smithsonian websites must not be made to a webpage on which the sponsor's products or services are promoted, marketed, and sold;
- h) External websites that enhance the content and/or broaden access of a Smithsonian website consistent with the mission and goals of the Institution. Examples include, but are not limited to:
 - External websites and applications on which the Smithsonian chooses to display Smithsonian content.
 - External websites that help Web users organize and share Smithsonian content with other users.
 - Related content including both online and traditional publications.
- i) Websites that collect personally identifiable information from members of the public (i.e., using SurveyMonkey to conduct a survey or using an e-commerce vendor to process donations) for Smithsonian use, subject to conformance with SI privacy policy requirements.

Units should consult with OGC and OCEA regarding external linking questions.

- **Links from External Websites**

The Smithsonian neither authorizes nor prohibits links to its website provided that such links do not connote an endorsement by or affiliation with the Institution.

- **Site Assessments**

Smithsonian Web practitioners should regularly evaluate and assess customer satisfaction and website usability. To improve the Smithsonian's Web presence, this assessment can be accompanied by gathering customer feedback and

POLICY (continued)

leveraging TRM-compliant automated tools to capture metrics reflecting visitor patterns and usage. Units should:

- a) Collect and monitor customer feedback such as through Web usage statistics, customer surveys, and email inquiries.
- b) Capture and report metrics, including site traffic, against unit goals.
- c) Evaluate site traffic to identify and correct or remove underused content.

- **Smithsonian Web Portal**

All websites should clearly identify the Smithsonian unit, and at a minimum the website's home page shall include a link labeled "Smithsonian" or "Smithsonian Institution" that points to the Smithsonian Web portal, www.si.edu.

The Smithsonian Web portal, www.si.edu, provides general information about the Institution, links to Smithsonian museums, research centers, and offices, terms of use, privacy policy, and certain other institutional policies. OPA is responsible for maintaining the content of the top-tier Smithsonian Web portal pages.

Security

- **Payment Card Industry Data Security Standard**

The Payment Card Industry Data Security Standard (PCI DSS) represents a common set of industry tools and measurements to help ensure the safe handling of sensitive card holder information to protect the security of consumers' credit card information during the storing, processing, or transmitting of cardholder data. If credit cards will be accepted on a Smithsonian website, the website shall be developed and maintained in compliance with SD 309, *Merchant Accounts, Payment Cards, and the PCI Data Security Standard*, regarding PCI compliance.

POLICY (continued)

All Smithsonian public-facing websites, whether or not they accept credit cards, are subject to PCI-compliance scans. Any third-party site authorized by the Smithsonian to process payment cards, on the Institution's behalf, is also required to be PCI compliant.

- **Security Certificates**

If a unit's website or Web application collects any PII or financial information from a visitor, the communication shall be encrypted using secure socket layer (SSL) or other methods approved by the Smithsonian's computer security manager, OCIO. The unit is responsible for the implementation of authentication technology, including security certificates, and for the initial costs of the security certificates for an individual website or application.

- **Security Reviews**

The OCIO director of computer security is responsible for conducting security reviews to identify authentication techniques or Web application vulnerabilities. These reviews are used to identify safeguards for protecting Smithsonian data and systems, and for protecting PII from unauthorized access and potential misuse.

The security review will ensure that the acquisition, access, use, and dissemination of PII comply with applicable Smithsonian security policies.

Security reviews will be conducted using tools approved by the Smithsonian computer security manager in OCIO for all websites, online exhibits, and Web applications. Where user authentication is warranted, an additional authentication review will be required to determine the appropriate authentication method.

- **Security and Performance Testing**

Before a new website, online exhibit, or Web application is moved to production, it shall pass security and performance testing requirements as

POLICY (continued)

established by the Smithsonian computer security manager and OCIO's Web Services Division. Security and performance testing is also required when there is a significant change — that is, not purely a content change.

Privacy

- **Collecting Personally Identifiable Information**

As a public trust, it is imperative that the Smithsonian collect, maintain, and disseminate personally identifiable information (PII) in a manner which does not adversely impact the integrity of, or the public's confidence in, the Smithsonian, its work, or its mission.

If a website or application collects PII, it shall only collect the minimal information required to meet Smithsonian mission or business needs; and PII that is knowingly and voluntarily provided by the visitor.

If an external website is used to collect PII from members of the public (e.g., an online survey or an e-commerce vendor), it must be clear to the general public that they are leaving a Smithsonian website, and that the destination website's terms of use and privacy policy will apply. Units should consult the SPO to develop disclaimer language and implementation methodology which will vary depending upon the facts and circumstances. (See Appendix A for sample language.)

PII must be protected in a manner commensurate with its sensitivity and the risk of harm to the individual from unauthorized use or exposure, regardless of the media type used to store it (i.e., paper or electronic).

- **Privacy Reviews of Personally Identifiable Information**

The SPO shall conduct privacy reviews of Smithsonian websites and websites operating on behalf of the Smithsonian that collect, maintain, or

POLICY (continued)

disseminate PII in electronic form from or about members of the public. The review will ensure that the collection, maintenance, and dissemination of PII comply with applicable Smithsonian privacy policies.

- **Children and the Internet**

While the Children's Online Privacy Protection Act of 1998 (COPPA) does not apply to the Smithsonian, the Institution is committed to protecting children and follows the provisions of the Act as a best practice. Units should consult the SPO before launching any website collecting PII from children under 13 or targeting that audience.

- **Privacy Notice**

The SPO is responsible for maintaining a standard Smithsonian Web privacy notice to be posted to www.si.edu/privacy; for coordinating with OCIO to translate this privacy policy into a standardized machine-readable format¹; and for updating this notice to reflect changes in the Smithsonian privacy policy in a timely manner. All Smithsonian websites (including those operated on behalf of the Smithsonian) must contain a link to the Smithsonian Privacy Notice or an SPO-approved Customized Privacy Notice.

The privacy notice, whether standard or customized, must be available in both machine- and human-readable format (e.g., Platform for Privacy Preferences Project [P3P]).

The SPO may grant deviations from the privacy policy on a case-by-case basis. Any deviation must be documented and include SPO-approved terms. These terms must include the duration of the deviation. The SPO shall review all waivers in event of a change in the Standard Privacy Policy.

¹ *Machine-readable Format* is a statement written in standard computer language (e.g., XML instead of English text) that can be interpreted by an application such as a Web browser. The Platform for Privacy Preferences Project (P3P) is the format developed by the World Wide Web Consortium for this purpose.

POLICY (continued)

- **Tracking Technologies**

Persistent tracking technology includes any technology that is intended to maintain information about a visitor beyond one browser session, such as a cookie. Session cookies, which are by definition not persistent, may be used to facilitate a visitor's activity within a single session and are not retained once the session has ended.

The Smithsonian allows the use of tracking technology on its websites for the purposes of:

- a) Gathering aggregate information about website visits in order to understand visitor use and experience on the websites, with the goal of improving use and experience;
 - b) Allowing website visitors to register with Smithsonian websites and set their preferences;
 - c) E-commerce activity, such as allowing for shopping carts and check outs;
 - d) Marketing Smithsonian products and services to consumers;
 - e) Conducting market research;
 - f) Serving relevant advertising;
 - g) Collecting marketing information about visitors on Smithsonian e-commerce² websites, including Smithsonian Enterprises' websites;
 - h) Collecting PII about subscribers and donors from online fundraising and membership websites, which are clearly identified as such;
 - i) Customizing a website at the visitor's request to enhance the experience.
- Any new use of a cookie that collects PII, except as noted above, must be approved in advance by the SPO. Questions regarding whether the use of a persistent tracking technology requires a privacy review should be directed to the SPO.

² *E-Commerce* is the buying and selling of goods and services over the Internet. Sites which require that the transaction be completed by faxing or mailing a payment are not considered e-commerce for the purposes of this directive.

POLICY (continued)

- **Visitor Communication Opt In/Opt Out**

Communications initiated by the Smithsonian, such as mass emails (e.g., reminders for programs or content updates) and electronic newsletters, may allow visitors to “opt-in” or “opt-out” of such communications under the following definitions:

- Opt-in means visitors take an action to indicate their willingness to participate (i.e., visitors affirmatively “check” a box).
- Opt-out means visitors are deemed to have granted general permission to receive communications unless they affirmatively “check” a box asking to be removed or unsubscribed from the list (i.e., visitors must “uncheck” a “pre-checked” box).

Smithsonian websites may allow visitors to opt-in to receive information (e.g., newsletters and emails about events, offers, products, and other opportunities) sent from Smithsonian and non-Smithsonian entities. Email messages from non-Smithsonian entities shall be limited to those with whom the Smithsonian has a written agreement that specifies the terms under which such messages and information may be sent.

Each email sent from the Smithsonian disseminating information as described above must:

- clearly identify the sender as a recognizable Smithsonian email address, and contain accurate header (e.g., “From,” “To,” and “Reply To”) information;
- include a subject line that accurately describes the message’s purpose;
- include the word “Smithsonian” in the text of the message;
- include instructions on how to “opt-out” of future receipt of similar email or newsletter correspondence; and
- not be misleading or deceptive, whether in the body or the subject line.

POLICY (continued)

Terms of Use and Permission Restrictions

Web content shall comply with applicable law and Smithsonian policy on copyright, trademark, right of publicity, right of privacy, obscenity, defamation, and other legal and content-based considerations such as those identified in SD 609, *Digital Asset Access and Use*.

- **Terms of Use Notice**

Websites must include a link to either the Smithsonian's standard Terms of Use Notice or an approved deviation. OGC is responsible for maintaining a standard Smithsonian Terms of Use notice. Only OGC may approve deviations from the standard terms of use on a case-by-case basis.

- **Use of Copyrighted and Restricted Material**

Smithsonian digital assets may be made available to the public unless they are subject to an allowable restriction category, as set forth in SD 609, *Digital Asset Access and Use*. Each unit is responsible for determining whether digital assets are subject to an allowable restriction category before posting or releasing digital assets.

For questions regarding the content-based restrictions applicable to digital assets, as set forth in SD 609, contact OGC or the unit's rights and reproductions office.

- **Release Forms**

When recording a speaker or performer who is not Smithsonian staff, the speaker or performer must be requested to sign a release form that gives the Smithsonian permission to disseminate and share the video either live or for later viewing (e.g., webcasts, streaming video). Units shall use the most recent dated speaker/performance release form template approved by OCon&PPM and OGC (and available on the OCon&PPM webpage), and contact OCon&PPM or OGC prior to engaging speakers and performers when clarification is required on the content of the release form.

POLICY (continued)

Accessibility

Efforts should be made to make websites accessible to all visitors, including those with disabilities and with limited English proficiency. Websites shall be designed, developed, and tested for a broad range of visitors, including those with lower-end hardware and software capabilities.

- **Standard Plug-Ins and Web Applications**

The use of plug-ins is permitted provided that their use is free and supported on multiple platforms and they are TRM-compliant or the unit has obtained a waiver from OCIO. The webpage shall provide links to websites where the appropriate plug-in can be downloaded if the visitor does not already have the plug-in installed.

Because the Smithsonian's mission is best met by diffusing knowledge among the largest number of visitors, non-standard plug-ins and technology are discouraged. If used at all, non-standard technology should be weighed carefully against any risks of reducing the number of visitors to the online exhibit or usage of the Web application due to increased bandwidth requirements, incompatibility with popular client browser technology, and/or incompatibilities with assistive technologies such as screen readers. The use of technology and plug-ins that are not listed in the TRM as "preferred" requires a waiver (see IT-940-TN01).

- **Consideration for Visitors with Disabilities**

New websites and Web applications shall be accessible by visitors with disabilities in accordance with SD 215, *Accessibility for People with Disabilities Policy*. During each major redesign of existing webpages and applications, the appropriate design changes shall be incorporated to make them accessible by visitors with disabilities.

The Smithsonian's Accessibility Program staff can provide guidance to assist with designing and testing websites for accessibility. The Accessibility

POLICY (continued)

Program staff should be contacted early in the planning of any new development or significant redesign when it is easiest and most cost effective to incorporate accessibility design considerations.

- **Search**

Webpages and Web applications shall be constructed to facilitate searching by the Smithsonian's search appliance and external Internet search engines (e.g., Google, Yahoo, Bing) to increase their findability.

- **Metadata**

Every webpage — created or modified after the effective date of this directive — shall contain at a minimum the following common meta tags for use by the Smithsonian's search engine:

- a) Title (of the page)
- b) Creator (Smithsonian unit name)
- c) Language
- d) Date (published to this website)
- e) Subject
- f) Keywords
- g) Description (of the page)

- **Portability of Information**

Websites and Web applications shall be designed and developed, when practical, to take the Smithsonian Web experience and share it on mobile and emerging platforms. At a minimum, the information when ported to a mobile or emerging platform should degrade gracefully (e.g., the page should still function even though its layout may not be optimal).

- **Usability of Data**

Many technologies allow users to take data from one website and combine it with data from another, commonly referred to as "Mashups." Smithsonian public-facing websites are encouraged, to the extent practicable for intended purposes, to provide all data in an open industry standard format that permits users to aggregate, disaggregate, or otherwise

POLICY (continued)

manipulate and analyze the data to meet their needs.

Development and Maintenance

- **Separation of Development and Production Environment**

Webpages, online exhibits, Web applications, and databases shall be developed and modified in a non-production environment; and tested *prior to* being deployed onto the production environment to the extent possible. Once deployed to the production environment, the new content should be retested to ensure that it is functioning properly.

- **Web Infrastructure Review**

OCIO will work with the units to assess trends and requirements in order to plan the evolution of the Institution's centralized Web infrastructure and development of shared services.

Units will coordinate their plans with OCIO for a new or significant redesign of a public-facing website, online exhibit, or Web application, to:

- a) Ensure that its infrastructure requirements — including Web development tools and applications — are supportable by Smithsonian infrastructure and staff, if necessary, at a later date;
- b) Determine whether the unit needs to request any waivers to the TRM in accordance with IT-940-TN01; and
- c) Conduct this required review, regardless of where the site will be hosted, to inform the Web practitioner up front of any risk and/or additional cost that may be expected during the life span of the site.

This review applies to all purchases and donations of hardware, software, and support services, regardless of the funding source, including in-kind donations. The review shall:

POLICY (continued)

- a) Address storage requirements, security concerns, estimated network traffic load, and methods of content deployment to the public Web servers.
- b) Identify the possibility of leveraging common tools already in use by other Smithsonian websites.
- c) Explore any risk associated with introducing any new Web technologies to an existing Web server.
- d) Identify any necessary Web infrastructure enhancements required to support their planned Web content if hosted within the Smithsonian's centralized Web infrastructure. This may include identifying a need for the unit to fund these enhancements.
- e) Determine if the project requires review by the Institution's Technical Review Board or Change Control Board, based on the scale, novelty, or sensitivity of the project.

If a unit later decides to move the site, application, or online exhibit from an off-site location to an OCIO-maintained server, the unit may be required to fund the cost of any modifications to its site or application so that it may be supported by OCIO. OCIO provides support for TRM-compliant systems. A waiver to the TRM granted to a unit does not indicate OCIO operational support.

Cosmetic or content only changes do not require OCIO review. If the Web practitioner belongs to a unit with a Web Management Office, the Web practitioner should coordinate the site's requirements with this office before contacting OCIO.

Smithsonian Enterprises (SE) is not required to coordinate its review with OCIO. Instead, SE shall conduct its own Web infrastructure review that addresses the same issues as the OCIO-conducted review, but with respect to SE's infrastructure environment.

POLICY (continued)

- **Web Servers and Storage**
Web servers and data storage will be consolidated, use off-site backups in case of an emergency, and should be designed with built-in redundancy to handle variations in traffic volume.
- **Common Web Development Tools**
Web development software tools shall be compliant with the TRM and the common Web infrastructure unless a waiver has been granted by the Chief Information Officer or designee.
- **Common Web Applications**
Websites and Web applications shall conform to Smithsonian standards, including the TRM, unless a waiver has been granted by the Chief Information Officer or designee.
- **Contracts and Purchase Orders**
Contracts and purchase orders awarded to develop, maintain, and operate Smithsonian websites, online exhibits, and Web applications, regardless of the amount, shall be obligated by OCon&PPM for SI units other than SE, unless a unit employee is authorized to do so by the Director, OCon&PPM. Obligations for such SE contract and purchase order awards shall be made by the President, SE, unless an SE employee is authorized to do so by the President, SE. Consult Form OCon-6, Restrictions on Purchasing List, for further guidance regarding contracts and purchase orders.
- **Donations of Software and Hardware**
Gift agreements that include in-kind donations of software and hardware must be coordinated with the unit's development office and reviewed by OGC and OCIO prior to acceptance, to ensure that the appropriate warranties, service, maintenance, compatibility, and other protections are provided as part of the gift. If a unit does not have its own development office, contact the Smithsonian's OA for guidance. For more information about in-kind gifts, refer to SD 809.

POLICY (continued)

- **Content Provider Contact List**

Each unit will maintain a current listing of individuals designated as the points of contact for the content of each of its websites, Web applications, and online exhibits, regardless of where they are hosted. This information will be provided at least to OCIO and OPA for purposes such as training, license/software purchases, communication, security, and maintenance issues; and to Smithsonian Institution Archives (SIA) to timely capture and retain these official and historical records of the Smithsonian. Contacts are encouraged to participate in the Webmaster Listserv and other Institution-wide collaboration vehicles to stay up to date on new developments within and outside the Smithsonian.

Records Management

Smithsonian websites, Web applications, online exhibits, and associated social media such as blogs and wikis, or excerpts thereof, deemed to have historical value, may be archived, as appropriate, by SIA in accordance with SD 501. Smithsonian websites often include functionality which allows scholars and the general public to interact with the Institution. Significant elements of these records consist of the user experience (design elements and the content), including user-generated comments.

- **Records Retention for Web**

Web practitioners should notify the SIA prior to launching a website or implementing a major change or addition to a website. SIA will evaluate the new website content or application to determine its record retention requirements. SIA will coordinate any necessary activity to transfer a copy of the website to SIA. Units are responsible for maintaining the currency of all supporting documentation.

- **Capturing Websites for Archival Purposes**

SIA will capture Smithsonian websites deemed by SIA as having historical value at regular intervals based on the frequency of significant changes. Web

POLICY (continued)

practitioners should contact SIA to request special captures of their Web content outside of the regular schedule.

Before websites are retired, the Web practitioner shall notify SIA, which will evaluate the website or the retired portion(s) to determine its disposition. If the retired website/website section(s) is determined by SIA to have historical value and has not been transferred to SIA in its current version, it shall be transferred to SIA along with its supporting documentation.

CANCELLATION:

None

INQUIRIES:

Office of the Chief Information Officer (OCIO)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue

April 20, 2012

SAMPLE NOTICE OF PII COLLECTION BY A THIRD-PARTY SITE

Smithsonian units must use a bumper, post a disclaimer, or use other technologies to inform members of the public when a third-party website is being used to collect personally identifiable information (PII) on behalf of the Smithsonian Institution, consistent with the requirements set forth in SD 950. Sample language is provided below. Smithsonian Institution units may contact the Smithsonian Privacy Officer at privacy@si.edu for further guidance.

The Smithsonian is using [insert name of vendor], a third party [insert description of the vendor], to [insert description of services]. Please be advised that [insert name of vendor] Privacy Statement [insert hyperlink to vendor's privacy policy/statement] applies to your use of these services. The Smithsonian does not have access to [insert description of information being collected], but receives [describe the type of data provided by the vendor, if appropriate] from [insert the name of vendor] which is subject to our privacy statement at <http://www.si.edu/privacy>.
