

## Penn Museum Human Remains Policy

2023-09-20

### Introduction

The Human Remains Policy (HRP) provides a rigorous basis for the ethical treatment of human remains in the Penn Museum in a way that centers human dignity and considers consent of the deceased and wishes of descendant communities. The scope of this Policy includes the care, research, teaching, and display of human remains held in the Penn Museum. Its goal is to provide a set of comprehensive guidelines for all aspects of the Museum's treatment of human remains.

Since 1990, Native American human remains in the Penn Museum have been treated within the legal framework and intended spirit of the Native American Graves Protection and Repatriation Act (PL 101-601, NAGPRA), US federal legislation which was passed as a result of decades long activism by Native American individuals and communities. A general Penn Museum statement on human remains was issued in 2017 (see below). The urgent need to center social justice in museum practice internationally was emphasized by a series of events from summer 2020 onwards including the killing of George Floyd and the growth of the Black Lives Matter movement; increased public scrutiny of the Penn Museum's use and display of the Morton Collection and its use of unethically collected human remains for research and teaching; the Penn Museum's involvement in the retention of human remains from the bombing of the MOVE house in Philadelphia; and our acknowledgement of the harm being done to descendant communities when human remains are subjected to study where no permission has or can be obtained. The Penn Museum's reevaluation of its policies regarding human remains was prioritized during this social call to action and is reflective of our Museum's renewed commitment to ethical stewardship which is also reflected in and expanded upon in our new 2023 Strategic Vision.

Building on its care and stewardship of Native American human remains, which have been inventoried and involved in ongoing repatriation activity since the early 1990s, the present Policy is one of several initiatives the Museum is carrying out relating to ethical care and repatriation of its human remains and culturally sensitive collections and is part of our work to dismantle systems that replicate colonialism and racism and to confront our institutional history which is tied to colonialist and

racist narratives. Other related activities include inventorying and improving storage conditions for all human remains; increasing staffing for the care, recording, and repatriation of human remains; and creating a new process, in addition to the Museum's established and ongoing NAGPRA work, for the repatriation of human remains that are beyond the scope of NAGPRA.

## Human Remains in the Penn Museum

As discussed in more detail below, "human remains" pertains to anything that came from a person including human skeletons and partial skeletons, cremated human remains, isolated elements, human remains in archaeological assemblages commingled with other remains, and human remains such as human hair or bone which are a part of another object. For certain cases, such as mummified individuals, the policy explicitly discusses the possible wrapped, unwrapped or shielded condition of the remains but this is not meant to imply that the policy is primarily or exclusively concerned with those cases.

Based on these criteria, the Penn Museum holds remains of over 10,000 individuals from around the world stemming from archaeological excavation and historic collecting practices and with varying levels of documentation and provenance. The best-known are those in the Samuel Morton collection of over 1300 human crania from across the globe, collected by Morton and others in the middle of the 19th Century, loaned to the Museum in 1966 and accessioned in 1996. The Museum is committed to producing a complete public inventory of its human remains over the coming years.

## Previous Work

A 2017 committee review of Penn Museum's collections practices involving human remains resulted in the Museum's "Statement on Human Remains" whose stated goal was to provide: "a general framework that acknowledges the complexities of human remains as part of our collections and strives to ensure that any use of our collections is conducted in a professional and respectful way."

From August 2020 to April 2021, the Morton Collection Committee consisting of a range of Museum staff and University faculty developed recommendations relating primarily to the ongoing treatment of the Morton collection of crania, but which also had implications for the Museum's broader approaches to human remains, including the recommendation that "the Museum should reassess its practices of collecting, storing, displaying, and researching human remains."

[<https://www.penn.museum/sites/morton/MortonCommitteeReport.pdf>]

In August 2021, the Tucker Law Group report on the Africa family remains at the Penn Museum which came from the bombing of the MOVE house in West Philadelphia, included similar language in its recommendation that the Museum should "Conduct a comprehensive review of the holdings and collection practices of the Museum's Physical Anthropology section and reassess its practices relating to the possession and various uses of human remains, accessioned as well as privately held."

[<https://www.penn.museum/documents/pressroom/MOVEInvestigationReport.pdf>]

## The 2022 Human Remains Policy

The Human Remains Policy Committee who produced this document was composed of representatives from a wide range of Museum and University departments and sections: the American Section, the Department of Anthropology, the Asian Section, the Center for Analysis of Archaeological Materials, Collections, Conservation, the Director's Office, Education and Programs, the Egyptian Section, Exhibits, NAGPRA, and the Registrar's Office. Holding a series of meetings between January to October 2022, the Committee separated into subcommittees to produce drafts relating to the topics of Stewardship, Research, Teaching, and Display. The subcommittees met separately and, in some cases, also sought the views of additional stakeholders and community members. Subcommittee drafts were presented, and each topic was comprehensively discussed over additional meetings.. The drafts were then consolidated, reviewed, and augmented with introductory material from October to November 2022.

A draft approved by the Committee was reviewed in May 2023 and updated in June 2023. In July the draft was distributed more widely to Museum staff for a comment period of two weeks. This feedback prompted further discussion and revision leading to the document as released in September 2023. It is anticipated that there will be annual reviews of the policy.

## Implementation

The Committee acknowledged that full implementation of the Policy will take time, involve multiple stakeholders, and require investment of resources (staff time and funding). The Museum is committed to this work and to being transparent about timelines and processes.

The Committee also acknowledged that it is impractical to foresee all eventualities within the limits of the Policy and established the need for ongoing work on the Policy itself and to ensure that Museum practice is clearly aligned with the Policy. With this in mind the following steps will be taken:

## Human Remains Committee

A Human Remains Committee (HRC) will be created at the same time as the Human Remains Policy is released and charged with review of human remains practices and policies. In addition to serving as a body for review and approval of research, teaching, and display of human remains, the HRC will collect feedback resulting from the application of the Policy to real-world situations which we anticipate will result in further revisions to the Policy. (See Appendix A).

## Human Remains Training

The new procedures relating to human remains will also include Human Remains Training which all staff, instructors, students, and researchers will be required to complete before interacting with human remains in the Museum. Descendant communities are not required to take this training. The training is presently under development (see Appendix B).

## Publicly-Available Inventory

The Museum is committed to producing a publicly-available inventory of all human remains in its care which will include information necessary for understanding the scope and content of the collection, but which will not include images of human remains. This inventory will be available via the Collections Online database.

## Improved Storage

Work on improving Biological Anthropology (formerly Physical Anthropology) Section storage and collections housing will continue through 2023. Additional staff hires relating to collection's care, research, and repatriation will also occur in 2023.

## O. General Background

This section covers considerations and challenges that inform other parts of the Policy and in some cases provides additional background resulting from the Committee discussions.

Within the scope of the HRP, "human remains", pertains to anything that came from a person, including but not limited to: human skeletons and partial skeletons; cremated human remains, alone or in association with containers or other mortuary features; isolated elements, other tissue, hair, teeth, etc.; human remains with soft tissue, hair, or parts of bodies with soft tissue in intact mortuary treatments; artifacts made of worked human bone; human remains in archaeological assemblages comingled with other remains; and man-made artifacts which incorporate human remains (such as human hair or bone) as part of the object.

Non-human ancestors and relatives are not considered as human remains under this policy.

The Committee recognized that research and teaching are fundamental activities of the University of Pennsylvania for the creation of new knowledge, the training of future generations of researchers and educators, and for the general education of students and the public, and that Biological Anthropology, as one of the four subfields of anthropology, is an important part of anthropological research in contextualizing and reconstructing past and present lives.

The Committee acknowledged that much of what is known about ancient societies derives from burials and their assemblages, including human remains, and that engaging with these can be a powerful way to communicate individual stories, beliefs, and cultural practices. As part of the University of Pennsylvania, the Museum has a role in teaching the next generation of archaeologists and anthropologists, including biological anthropologists and bioarchaeologists, and for sharing a general understanding of anthropology with the public.

At the same time, the Policy recommendations concerning research and teaching with human remains aim to limit the extent to which human remains are used in classrooms and public engagement, and to ensure that research requests concerning human remains are subject to rigorous review prior to approval.

The Committee emphasized the need to communicate the difficult historical reasons for the Museum's holdings. It reiterated the Museum's goal of engaging with descendant communities, whenever possible, in order to carry out their wishes in respect to the individuals from those communities and to provide appropriate access for descendant community members.

With the exception of research aimed at repatriation or community restoration, human remains which were collected unethically and without permission will not normally be available for research, teaching, or display. Human remains from archaeological excavations carried out in conformity with legal provisions of the time of their excavation and human remains for which the Museum has written documentation confirming their use which derives from the deceased individual, their next of kin, or descendant community, may be accessed with certain restrictions, for research, teaching, or display.

In circumstances where human remains are not to be used, images, casts and reproductions may be substituted, with appropriate advisories about the fact that these are not actual human remains and maintaining standards of respectful treatment and handling with input from the HRC.

# 1. Stewardship

## 1.0 Introduction

This part of the policy pertains to the stewardship and care of human remains at the Penn Museum. It addresses acquisitions, deaccessions, claims for return, loans, conservation treatment, storage, and general collections management. The Penn Museum is committed to a systematic re-inventory and review of its biological anthropology collections, both in the Biological Anthropology Section and others, which will be made public upon completion.

## 1.1 Acquisitions

1. Penn Museum will comply with all state, federal, and international laws that relate to the acquisition of human remains.
2. New acquisitions of human remains, regardless of origin, will be accepted and accessioned into the collections only exceptionally and after a case-specific legal and ethical review is presented and accepted by the Acquisitions Committee, the HRC, the NAGPRA Committee as needed, the University's Office of General Counsel as considered necessary by consensus of the review groups, and the Williams Director.
3. No non-Penn Museum human remains will enter the Museum, even temporarily, without approval of the HRC, the Director of Collections, Conservation, the Registrar's Office, the NAGPRA Committee as needed, and the Williams Director.
4. All acquisitions will adhere to the Penn Museum's extant **Acquisitions Policy and Procedures**.
5. Penn Museum recognizes the following categories of acquisition:
  - a. Acquisition Resulting from Archaeological Research:
    - i. A portion of Penn Museum's current collection of human remains was acquired during university-sponsored excavations. While the Penn Museum continues to participate in excavation projects throughout the world, it is the Museum's policy to accession human remains only in exceptional circumstances. Archaeological material may enter the Museum for the purposes of analysis by researchers only as Sampling & Analysis Material (SAM, a form of incoming loan). This material will only enter the Museum if it was collected and, where relevant, exported legally and with the full consent of applicable governing bodies. In cases where descendant communities are potential stakeholders, either permission from the communities or documentation of a good faith effort to obtain such permission must be provided.

Any human remains entering the Museum will be subject to an agreement formulated by the HRC, which must approve the entry of the human remains into the Museum. This agreement will include but may not be limited to the definition of the duration of the SAM-loan, storage location and conditions, and contact information for return of the remains.

- ii. In some instances, current collections of faunal SAMs may be reviewed and found to contain human remains. If and when this occurs, the identified human remains will be stored separately from the faunal materials and tracked under a separate catalog record in EMu, the Museum's collections management database. The relevant Curatorial Section should then document the human remains and make a good faith attempt to report the remains to the appropriate governing body or source community.
  - iii. Human remains are routinely found during local city and state sponsored excavations. The Penn Museum does not anticipate that the City of Philadelphia or the State of Pennsylvania will ask the Penn Museum to be the repository for such human remains. However, if such a request is ever made, the Museum will review each request on a case-by-case basis.
- b. Acquisition by Transfer:
- i. As has occurred historically, some institutions may feel they are no longer able to properly steward human remains in their collections and may ask Penn Museum to take on their stewardship.
  - ii. In such cases, the Biological Anthropology Section and/or other relevant Curatorial Sections must propose a plan for the care and stewardship of any potential transfer of human remains from another institutions. (i.e., where and how the material will be stored and cared for). A case must be made for Penn Museum being better able to steward the material than the institution where it is currently held.
  - iii. Any potential acquisitions by transfer must be reviewed and approved by the HRC, the Director of Collections, relevant section Curator(s) & Keeper(s), Conservation, the Registrar's Office, the NAGPRA Committee as needed, the University's Office of General Counsel as needed, and the Williams Director prior to a physical transfer of human remains to Penn Museum and presentation to the Acquisitions Committee.



- c. Acquisition by Donation
  - i. Penn Museum does not accept donations of human remains from private individuals.
  - ii. In exceptional cases, Penn Museum may assist private individuals with repatriation efforts by temporarily taking possession of human remains in order to facilitate repatriation. Any such requests must be accompanied by appropriate documentation and reviewed and approved by the HRC, the Director of Collections, Conservation, the Registrar's Office, NAGPRA Committee as considered necessary by consensus of the reviewing groups, and the Williams Director.
- d. Acquisitions by Purchase
  - i. With the exception of ethically sourced and consented teaching collections (which are not accessioned into the collections), the Penn Museum does not purchase human remains.

## 1.2 Deaccessioning & Claims for Return

1. All deaccessions of human remains will adhere to Penn Museum's extant **Deaccession Policy and Procedures** and to the **NAGPRA Policy and Procedures**.
2. The Museum complies with the Native American Graves Protection and Repatriation Act (NAGPRA, P.L.101-601) and its implementing regulations.
3. While NAGPRA provides a process under Federal law for repatriating U.S. Native American human remains and cultural items, the Museum will also evaluate and respond to requests from other communities or governments with the appropriate standing, as assessed by the HRC and the University's Office of General Counsel. Every effort will be made to enter into equal and open communications with the communities, entities, and governments that connect themselves to the human remains and cultural items in Penn Museum's custody.
4. Special consideration will be given to international treaties such as the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property, and to the work and guidelines of the United Nations Permanent Forum on Indigenous Issues (UNPFII).
5. For material to be returned outside the legal boundaries of NAGPRA, Penn Museum's forthcoming non-NAGPRA Repatriation Committee will initiate deaccession and disposition procedures, which will be modeled after NAGPRA deaccession and disposition procedures.

### 1.3 Loans

1. All incoming and outgoing loans of human remains will adhere to Penn Museum's extant **Incoming Loans Policy and Procedures** and **Outgoing Loans Policy and Procedures**.
2. Current Incoming Loans:
  - a. Penn Museum currently houses long-term incoming loans of human remains, as well as sampling & analysis materials (SAMs) that include human remains.
  - b. Penn Museum stewards these human remains, but does not hold legal title to them, and consults with the legal possessors as needed.
  - c. Incoming loans of human remains will be governed by the same policies and procedures as Museum accessioned human remains unless the loan agreement states otherwise.
3. Current Outgoing Loans:
  - a. Penn Museum currently has outgoing research loans which include human remains. These loans are governed by up-to-date loan agreements, which are reviewed and renewed every 1 – 3 years.
4. Future Incoming Loans:
  - a. It is Penn Museum's policy not to accept incoming loans of human remains for purposes of exhibition or display. In exceptional cases the Museum may accept incoming loans of human remains for:
    - i. Research purposes.
    - ii. If another institution is no longer able to care for human remains in their custody.
    - iii. In preparation for repatriation when assisting another institution/government/entity with a repatriation.
  - b. Any proposed incoming loans of human remains must be reviewed and approved by the HRC, Director of Collections, the relevant Curator(s) and Keeper(s), Conservation, the Registrar's Office, the NAGPRA Committee as needed, and the Williams Director.
5. Future Outgoing Loans:
  - a. It is Penn Museum's policy not to loan out human remains from its collections to other institutions for purposes of exhibition or display. Exceptions may be made at the discretion of the HRC where the loan request derives from a descendant community.
  - b. Human remains may be loaned to another institution or federal agency for the purposes of completing NAGPRA and non-NAGPRA repatriation/return processes.
  - c. In exceptional cases the Museum may loan human remains from its collections for research and teaching purposes.

- d. It is also possible that on occasion human remains might leave the Museum and be given into the care of non-museum staff to carry out specific research analysis. In such cases this will be recorded using appropriate Museum outgoing loan paperwork and scientific testing procedures.
- e. Prior to approval, the requesting entity agrees to the following requirements:
  - i. The requesting entity is responsible for consulting with contemporary indigenous or other originating communities with regard to loan requests of human remains from those communities. The Penn Museum reserves the right to participate in the determination of which communities should be consulted.
  - ii. The requesting entity must provide written documentation that the relevant communities approve of the loan.
  - iii. The requesting entity must adhere to all requirements set forth in Penn Museum's **Human Remains Policy and Loan Agreement**.
- f. Any proposed outgoing loans of human remains must be reviewed and approved by the HRC, Director of Collections, the relevant section Curator(s) and Keeper(s), Conservation, the Registrar's Office, the Scientific Testing Committee as needed, the NAGPRA Committee as needed, and the Williams Director.

#### 1.4 Conservation Treatment

1. The Conservation Department is responsible for determining and carrying out all conservation treatment of human remains. Conservation treatment is typically carried out to aid in research and study of remains (see the Research and Teaching Sections of this policy), for display (see Section 4: Exhibition and Display), and to improve storage conditions.
2. Conservation actions and decisions are guided by the American Institute for Conservation (AIC) Code of Ethics and Guidelines for Practice.
3. Conservation treatment decisions are made in consultation with the associated Curatorial Section and staff subject specialist, such as the Biological Anthropology Keeper, as well as descendant communities and other stakeholder communities when possible.
4. All Conservation treatment decisions should consider the cultural preferences of the individual and/or the community of origin.
5. Conservation treatments will adhere to the principles of minimum intervention and re-treatability. Conservators will aim to use completely reversible methods when possible and will inform themselves about any possible issues

(i.e., adhesives that may contaminate DNA) before choosing materials to use in treatments.

6. Before determining the need for Conservation treatment, the Conservation Department carries out examination of human remains, which is always accompanied by standard record photography and a written condition report. Other types of imaging (i.e., multimodal imaging, reflectance transformation imaging) may also be performed. Analytical imaging such as x-radiography and CT scanning is used to learn more about physical features that are not visible (skeletal morphology, personal adornment). Portable x-ray fluorescence (pXRF) analysis is often used to guide conservation decision-making and health and safety precautions. Prior to carrying out imaging and other analysis beyond standard conservation documentation, conservation staff, in combination with the HRC and the Human Remains Training program as necessary, will inform themselves on ethical considerations including cultural perspectives prior to collecting data. X-radiography, CT-scanning, pXRF analysis must also be approved by the associated Section. Conservation will discuss decision-making with community members as possible. Proposed Conservation treatments of human remains will also be subject to review by the HRC.
7. Treatment carried out by the Conservation Department occasionally includes removing samples for analysis.
8. All testing beyond standard forms of examination carried out by the Conservation Department, whether destructive or non-destructive, sampling, and all scientific examination other than visual or those using standard microscopy, must be approved in advance by the Scientific Testing Committee (STC) and the HRC. The proposed sampling of any Native American or Native Hawaiian human remains is also reviewed and approved by the Museum's NAGPRA Committee. All sampling of human remains must be carried out in collaboration with Museum colleagues, including the Section and staff subject specialist, such as the Biological Anthropology Keeper.

## 1.5 Storage

1. Human remains and associated cultural items shall be stored in collections storage areas that have restricted and monitored access. Furthermore, storage cabinets/rooms containing human remains shall be clearly marked.
2. In an effort to distinguish casts and reproductions of human remains and non-human ancestors from real human remains, casts and reproductions should be stored inside boxes and storage containers whenever possible, and their packaging should be clearly labeled as "reproductions." Furthermore, casts and reproductions should be physically numbered as appropriate using reversible, conservation-approved labeling procedures.

3. Human remains will be stored in a manner that aids in their long-term preservation, which may include enclosed or covered boxes, trays, or other appropriate storage containers made of inert and stable materials. This storage policy may be overruled by specific requests of next-of-kin or community of origin, subject to a feasibility review and approval by the Conservation Department and Curatorial Section.
4. The Museum will endeavor to store human remains in monitored environments (temperature & relative humidity) suitable to the material as recommended by current conservation guidelines.
5. Storage rooms with human remains will be regularly cleaned and monitored for pest activity.
6. The Museum will provide space for next of kin and descendants to access, view, and honor individuals housed in the Museum.

## 1.6 Collections Management

1. Detailed information on all human remains stored at the Penn Museum is recorded in the collections management database, EMu. This includes not only accessioned human remains, but also incoming loans of human remains, as well as the teaching collection.
  - a. Only partial records of human remains will be viewable on the Museum's public website. Full EMu catalog records of human remains will be viewable only by staff members through the internal collections database.
  - b. Selected fields of each EMu catalog record relating to Human Remains will be made available in the online collections database as part of the public availability of the Museum's inventory of Human Remains. These online records will be suitable for descendant communities and individuals to look for and find ancestors, and for researchers to identify Human Remains relevant for their research programs. The HRC will be responsible for determining which EMu fields will be made available online.
  - c. EMu records for objects that contain components of human remains, such as human hair, should be reviewed on a case-by-case basis by the relevant Curatorial Section, the Registrar's Office, the HRC, the NAGPRA Committee as needed, and the Director of Collections to determine their appropriateness for display in the online collections database. Where appropriate and feasible community consultation and/or review should also be carried out.
  - d. EMu catalog records for human remains should always include:

- i. "Human Bone" or "Human Remains" as the Material Type in the Production Tab, which will automatically prompt the addition of the "HRs" symbol on the Summary Data area.
  - ii. "Sensitive Media" located in position 1 in the Multimedia Tab, which will warn staff that sensitive media is located in that tab.
2. Human remains will have their packaging clearly labeled with their assigned Museum number. Rooms and individual storage cabinets that contain human remains will be clearly marked with appropriate signage to alert staff prior to their entering a room or opening a cabinet containing human remains.
3. At the Museum, human remains will be handled only by Museum staff, approved researchers and students (who will be supervised by Museum staff), or by members of descendant communities or their designated officials.
  - a. Researchers and students will be permitted to handle human remains only after completing Human Remains Training.
  - b. Remains will only be packed and unpacked from boxes by Museum staff or those who have received guidance on the methodology for doing so.
  - c. All handling of human remains will take place in designated storage, teaching, and repatriation consultation areas, or conservation labs, unless otherwise agreed upon by the relevant curatorial section's Curator(s), Biological Anthropology Curator and Biological Anthropology Keeper.
  - d. Descendant communities are not required to take Human Remains Training.

## 2. Research

### 2.0 Introduction

This section of the HRP concerns use of human remains for research purposes including academic research at all levels as well as the research entailed in evaluating repatriation claims. The goal of the recommendations in this section is to allow future properly grounded work on human remains while ensuring that the work is evaluated for suitability and carried out in compliance with the Museum's protocols.

### 2.1 Research Access Requests and Procedures

1. Research of and access to human remains held by the Museum—either as accessioned collections or part of the museum's non-accessioned collections—will be considered on a case-by-case basis. While this Policy applies primarily to accessioned collections, all SAM material, loaned material, and unaccessioned material by default also fall under this Policy.
2. Research requests involving human remains must be submitted to the relevant curatorial section(s) as outlined in the Collections Access Request form. If the human remains have not been accessioned and are not held by a curatorial section, research requests will be considered by the Curator or Penn faculty or staff member who is responsible for them; such requests will still require the additional approvals specified in the following points of this section.
3. Any requests involving collections flagged for repatriation under NAGPRA will also need to be reviewed by the NAGPRA committee.
4. The curatorial section, responsible Curator, or Penn faculty or staff member will review the request and, if approved at a section-level, the request will be forwarded to the HRC for further review, as well as the Scientific Testing Committee when testing is requested.
5. The HRC will review the proposal to ensure the following:
  - a. The research involving human remains aligns with the University's and Museum's missions.
  - b. The researcher meets the requirements outlined in the Human Remains Policy document, as well as the Museum's Guidelines for Access to Collections document.
  - c. The source and/or descendant community practices and cultural norms are appropriately considered during research.
  - d. The individual proposing research has completed or will complete the Human Remains Training requirements before starting research.
6. If approved, any research on or access to accessioned material will be coordinated directly with a representative from Collections, who is responsible

for ensuring the researcher follows the outlined policies and procedures. Researchers will be advised of Museum procedures and receive Museum Human Remains Training, and will be required to adhere to all Museum protocols as a condition of their continued access.

## 2.2 Eligibility to propose or participate in research involving human remains

1. Museum staff including Curators, Collections, and Conservation staff. (Note that normal activities related to collections stewardship do not require special approval.)
2. Penn Faculty
3. Graduate Students with approval of faculty advisor
4. Undergraduate students with approval and oversight of faculty advisor, and appropriate coursework or experience
5. Specialized non-Museum Penn staff (e.g., School of Medicine, Dental School)
6. Non-Penn researchers and faculty members; graduate students in other programs (with faculty advisor written approval); independent scholars.

## 2.3 Research methods

1. Research methods include but are not limited to:
  - a. Archival research: field notes and photographs, collections records, existing scans, x-rays, other associated material.
  - b. Description and comparison: recording variation in size, morphology, measurements; recording surface features including life history, evidence for disease and healing, and trauma; recording evidence of post-mortem changes including cultural modifications and non-cultural taphonomic changes.
  - c. Image Recording: photographs/digital microscopy images, CT scans, X-rays, 3D images from photogrammetry.
  - d. Casting: preparation of silicone molds on bone or tooth surface to cast epoxy replicas for detailed measurements, SEM analysis, etc.; where possible, scanning is to be preferred to direct casting.
  - e. Destructive sampling: removing samples of bone, teeth, or other tissue; for isotopic and trace element determinations, genomic research, isolation of pathogens; thin section sampling for histology and taphonomy; samples for dating; sampling materials associated with or adhering to bone and teeth (e.g., artifacts, dental calculus, soft tissue, other organic residues, soil, minerals).



## 2.4 Reporting research results and outcomes:

1. In accordance with the standard research agreement, the researcher agrees to submit a digital copy of any paper or publication that results from the work undertaken during the research visit, including any and all analytical data from analytical review, results from laboratory sampling and analysis, images (photographs, lab images, illustrations, drawings, videos, x-rays, CT scans, 3D scans, and other media) collected during the research visit, and any other associated material generated directly from the visit.
2. All analytical results (i.e., digital data) will be sent to the HRC (to be uploaded to the Museum's collections database). Based on National Science Foundation (NSF) guidelines, the Penn Museum will hold test results (raw data) confidential for up to five years or until after the publication of the test results by the Requestor, whichever comes first.
3. Any samples removed from human remains but remaining after analysis should be returned to the Curatorial Section. Returned portions should be stored with the original remains to preserve the association, and this return noted in EMu.
4. Any unpublished analytical data (e.g., digital records, experimental protocols, negative assays) should be shared with the Curatorial Section, even if it is not part of the eventual publication.
5. Images deriving from research activity are also subject to the policies given in the Images Appendix.

## 3. Teaching, Education, and Public Programs

### 3.0 Introduction

This section pertains to K-12 programs, including in-person and virtual classes, workshops, making sessions, and tours; to public programs of all kinds; to University of Pennsylvania graduate and undergraduate classes; to class visits led by instructors from and/or including students from other institutions; to student-sponsored programs, conferences, tours, and public programs; and to supervised student research in laboratories and classrooms.

### 3.1 Training for Educational Access to Human Remains

1. Human Remains Training covers relevant legal codes, ethical codes, respectful handling practices, stewardship and conservation concerns, and respectful language practices.
2. Human Remains Training will be required for all instructors, students, and researchers seeking to access human remains not on public display.
3. Students in upper-level classes where human remains will be used in the classroom will also receive this training before the human remains are introduced.
4. Training, or training materials will be available to other Museum staff members who need to understand the issues involved in displaying and learning from human remains.

### 3.2 Teaching & Education

1. Goals for education using human remains are stated in the Introduction to this policy.
2. Access to the human remains in the Penn Museum collection for educational purposes is provided through classroom sessions (in-person and virtual), exhibits, and digital media, but not in storage spaces.

### 3.3 Procedures for educational access to human remains and associated records and digital data

1. Human remains are accessible to upper-level undergraduate (ANTH 2000-3999) and graduate-level university classes in the fields of biological anthropology, bioarchaeology, and human biology.
2. Requests to access human remains for lower-level biological anthropology, bioarchaeology, and human biology classes (ANTH 0000-1999) may be reviewed by the HRC on a case-by-case basis. Students in lower-level courses will not handle the remains directly.
3. Requests to handle human remains in classes must be made in writing in advance and are reviewed by the HRC as well as the relevant Section. The

advance notice required for use of Human Remains in class use is set by the HRC. Requests for class use will specify the instructional purpose and include the syllabus on the Class Visit form: <https://www.penn.museum/learn/penn-instructors/class-visit-request-form>

4. The Curatorial Section will review the request and, if approved at a section level, the request will be forwarded to the HRC for further review. Requests will also be reviewed by the Scientific Testing Committee and NAGPRA Committee at the discretion of the HRC.
5. The HRC will review the proposal to ensure the following:
  - a. The teaching involving these human remains aligns with the Museum's teaching and research missions.
  - b. The teacher/facilitator meets the requirements outlined in the Human Remains Policy document, as well as the Museum's Class Visit requirements.
  - c. The source and/or descendant community practices and cultural norms are appropriately considered during teaching.
  - d. Any individual working with human remains has or will complete the Human Remains Training requirements before commencing work.
6. If approved, any class-use access will be coordinated directly with a representative from the Academic Engagement department, who is responsible for ensuring classes follow the outlined policies and procedures.
7. Museum staff (Curators, Keepers, Collection Coordinators, and others designated) will supervise all educational access to human remains not currently on display.
8. Students must receive content advisories about human remains being used in the classroom prior to the beginning of the class so that they are able to opt out of these activities.

### 3.4 Educational access to human remains in museum spaces

1. Storage: Human remains storage rooms will not be accessible for teaching or educational purposes.
2. Other locations where educational access may be provided are listed in Appendix D.

### 3.5 Student Research

1. Museum staff (Curators, Keepers, Collections Coordinators, or other designated staff) will supervise all student research access to human remains in approved research spaces or designated classrooms.
2. Student researchers will make requests for access to human remains through the "Student Research Request" form (<https://www.penn.museum/learn/penn-students/student-research-access-request>) with a research plan and after they have completed human remains handling training. The faculty

advisor or instructor supervising the research must be specified on the research request.

3. Students carrying out research on human remains for individual coursework must include the course name and number and their course instructor in their research request.

### 3.6 K-12 and Public Programs

1. Human remains not on display are not accessible for K-12 programs or public programs
2. Content advisories about the presence of human remains in the building and on display in the Museum should be provided at the start of each gallery tour or in advance of K-12 programs.
3. The request by any staff, student, or visitor not to participate in a program involving the presence of human remains will be respected and where feasible alternate activities should be provided.
4. As a general principle, if specific human remains would be considered appropriate for display in galleries (even if they are not on display) then imagery of those human remains may be used for K-12 and public programs with the proper content warnings and alternate activities and where the use of imagery is aligned with curricular needs.
5. If specific human remains would not be considered appropriate for display in galleries, then images, scans (e.g., x-rays, CT scan, 3-D external scan), and associated data (e.g., measurements, archival, registration) of those remains may not be used in K-12 programs.
6. Images, scans (e.g., x-rays, CT scan, 3-D external scan), and associated data (e.g., measurements, archival, registration) of specific human remains which would not be considered appropriate for display may nevertheless be made available for public programs at the discretion of the HRC.

### 3.7 Educational programs and human remains on exhibit at the Penn Museum

1. K-12 programs and tours:
  - a. May include human remains on display as part of planned programming; this should be made clear at the time of booking the program.
  - b. An "opt-out" activity should be created for each tour or program that enters gallery spaces where human remains are on display.
  - c. Teachers can also request to have those portions of the tour omitted.
2. Public programs and tours, and university programs and tours:
  - a. May include human remains on public display.
  - b. At the start of the tour, groups should be asked whether they would like those portions of the tour omitted.

- c. Content advisories should be included in program descriptions and on the museum's website.
3. University-level guest lectures and tours (e.g., provided by Museum Curators, Museum Staff, University instructors, Graduate Guides) designed for university-level courses:
  - a. May include human remains on public display.
  - b. Instructors can request to have those portions of the tour omitted.
  - c. An "opt-out" activity should be created for each tour or program that enters gallery spaces where human remains are on display.

### 3.8 Educational use of images of human remains in Museum programs

1. Programs (in-person and virtual) including images of human remains (e.g., photographs, digital renderings, or artistic renderings) should provide a content advisory at the beginning of the program, and again just before images of human remains, and it should be announced when those images have passed.
2. K-12 programs will only use artistic renderings of human remains.
3. An "opt-out" activity will be created for each K-12 tour or program that includes such images.
4. Penn Museum staff members or guest speakers may use images of human remains with appropriate notification of the audience and content advisories. Guest speakers at public programs (e.g., lectures, conferences, workshops) will be asked to provide content advisories of images of human remains; they should be notified of this policy prior to the program being scheduled

## 4. Exhibition & Display

### 4.0 Introduction

This section pertains to the display and exhibition of human remains as defined in the General Background section of this Policy.

It also addresses display of images and replicas of human remains both mechanically produced (i.e., photographs, lab images, CT scans, 3D models) as well as illustrated (e.g., archaeological diagrams, tomb drawings, and casts).

This policy also offers guidance on design and signage accompanying display of any of the above.

### 4.1 Considerations in the Display of Human Remains

1. Prioritization of human dignity over public access.
2. Differing cultural practices around the use of human materials given during life, such as hair; death and burial; and the display of human remains. Cultural or religious sensitivities that relate to being in the presence of the deceased.
3. Provenance of the human remains in our collection and the circumstances under which they came to the University.
4. Legality and ethics around the collecting practices or past treatment of the remains.
5. Consent and wishes of the deceased individual and descendant communities. When this is not possible due to the passage of time, we will consider community consultation, source community practices, and cultural norms before planning for the display of human remains.
6. Visitor learning, perception, takeaways, and comfort around the viewing of human remains, gleaned from visitor research.
7. Potential to use casts, reproductions, or images in place of human remains.
8. Interpretation and design approach to displaying human remains, including shielding, warning signage, and interpretive methods.
9. Condition of the remains from a conservation/preservation perspective.
10. Current state of the remains—completely wrapped, preserved soft tissue, skeletal, the nature and extent of remains included in other cultural items.

### 4.2 Policy for the Display of Human Remains in the Penn Museum

1. Out of respect for the deceased and visitor comfort, no exposed human remains will be considered for display.
2. Fully wrapped human remains or those encapsulated (e.g., in coffins) may be considered for display if the remains meet the criteria listed below:

- a. The planned display meets the standards of source and/or descendant community practices and cultural norms.
- b. Views and sensitivities of the local community, visitors, students, and partners are considered through mechanisms such as community advisory group consultation and survey.
- c. The presence of the human remains is an important part of the narrative of the exhibition or gallery. Remains are humanized and the story of the individual is told to the fullest extent possible.
- d. Human remains are treated with respect throughout the process. The Museum will work to create a reverential and reflective atmosphere in the presence of the mummified individuals and other remains.
- e. Conservation requirements and recommendations are considered in display decisions.
- f. Signage is provided to instruct visitors on respectful behavior in the presence of human remains while in the Penn Museum (see signage and shielding below).
- g. If the individual has associated funerary material (i.e., a coffin) the Museum will make best efforts to keep individuals together with their associated materials when possible. We may decide to display an individual along with their materials for this reason.
- h. If the individual is not fully wrapped, they will be wrapped or encapsulated before display.

### 4.3 Decision to Display

1. In instances where there is an identified source or descendant community, their wishes will determine the Museum's approach to display of specific human remains. Relevant stakeholder communities will be identified by internal/external scholars and advisors.
2. The Museum director makes final decisions about human remains on display, with input from scholars, descendant community members, the HRC and other advisory bodies, in accordance with the criteria in this policy.

### 4.4 Location Considerations, Signage, and Shielding

1. Sensitive visitors should be able to fully avoid human remains while experiencing the majority of the museum. Galleries which are also primary pathways through the building require special consideration.
2. Signage will be visible before encountering the remains, so that visitors can choose to avoid the display.
3. Signage alerting visitors to the presence of human remains will be visible at Museum entrances, at entrances to galleries containing human remains, and on cases containing human remains.

4. Signage announcing the presence of human remains should be transparent and straightforward regarding consent and the history of how the remains came to the museum.
5. All displays containing human remains must include signage indicating that the Museum asks visitors not to photograph remains.
6. Shielding can involve a wall or separate room from a main pathway.
7. In advance of an exhibit opening, information will be provided to the public if the display contains human remains. Information will be available on the Museum's website. Clear communication and transparency should guide this messaging to allow those who have religious or cultural sensitivities to the display and/or viewing of remains to make informed decisions.

#### 4.5 Images

1. Images (e.g., photographs, lab images, and drawings) or video of human remains, wrapped or unwrapped, may be used but the source, consent, and depictions should be carefully considered.
  - a. Images of human remains will not be shielded in the same way as the human remains themselves, but they will be used with care. An advisory will be given for visitors before encountering photographs or medical scans.
  - b. All photographs/CT/X-ray images used should be in service to the humanity of the individual(s) or communities presented (e.g., CT scans that are used to learn more about the life of the person).
  - c. Icons/archaeological drawings and other form-reduced depictions do not require the same type of cautionary notices. Drawings are preferred over photographs whenever possible.
  - d. Photographs or other images of human remains are never appropriate for use without context and should not be used for the general website, social media, or marketing purposes.
  - e. Historic content present on the Museum's archival database may not conform to these restrictions and may not be able to be changed, in which case the website should provide a conspicuous disclaimer to that effect.

#### 4.6 Reproductions

1. Use of reproductions of human remains in exhibitions (e.g., casts, 3D scans, and purchased reproductions) requires evaluation on a case-by-case basis. Careful evaluation of the possibilities should be undertaken by the exhibit design, interpretive, and curatorial team prior to review by the HRC.
2. In some cases, facsimiles of the human remains may be appropriate depending on their context and relevance to the narrative purpose of their inclusion. In other cases, the effective impact of facsimiles may be considered



tantamount to the inclusion of the actual human remains. In such cases alternative presentation forms must be considered.

3. Visitors should still be warned/alerted to their presence of reproductions and be made aware of the fact that they are not real human remains in order to avoid confusion.
4. Non-specific reproductions (e.g., a replica bone purchased from a vendor that represents a typical specimen) fall into this category.

## Appendix A: Human Remains Committee

*The following description of the Human Remains Committee (HRC) is provisional; following the initial constitution of the HRC the Committee will define by-laws which govern its organization and operation.*

1. The HRC is responsible for the ongoing implementation, oversight, and review of this and any other policies concerning the Museum's human remains collections.
2. The HRC reports to the Penn Museum's Williams Director.
3. The HRC Chair is selected on a rotating basis from among the permanent members of the HRC.
4. The group will include the following positions or representatives from the following departments (permanent members may delegate other appropriate representatives, normally from within their department, with the approval of the HRC Chair):
  - a. Biological Anthropology Curator (permanent)
  - b. Biological Anthropology Keeper (permanent)
  - c. Chief Curator (permanent)
  - d. Director of Collections (permanent)
  - e. Senior Registrar (permanent)
  - f. Head Conservator (permanent)
  - g. CAAM Director (permanent)
  - h. Other Curatorial Department (annual rotation)
  - i. Anthropology Department representative (annual rotation)
  - j. NAGPRA or repatriation representative (permanent)
  - k. Penn Museum Diversity Committee member (annual rotation)
  - l. Additional external stakeholders/experts TBD
5. The Committee's remit will be to review incoming proposals for teaching, research, and exhibition on an as-needed basis (as outlined below), as well as an annual review of the Human Remains Policy. This includes review of the forms used to make requests such as those for research and class use in order to ensure that the requisite information about intended use of Human Remains is captured at the time of the request.
  - a. Teaching Review:
    - i. Requests for access to human remains for class use must first be submitted through the Class Use request form.
    - ii. The Academic Engagement Department will coordinate preliminary review with the relevant curatorial section(s).
    - iii. If approved by the curatorial section(s), the AED representative must then forward the request to the HRC for review to ensure the request follows the stated guidelines.

- iv. The HRC will review research requests on a monthly basis.
  - v. Standard class use requests must be submitted in advance of their anticipated visit. The advance notice required for use of Human Remains in class use is set by the HRC.
  - vi. Further information for research procedures is detailed elsewhere in this document, as well as the Museum's Class Use Policy.
- b. Research Review:
- i. Requests for access to human remains by researchers must first be submitted to the relevant curatorial section(s), Curator, or Penn faculty or staff member for their review.
  - ii. If approved by the curatorial section(s), the section representative must then forward the request to the HRC for review to ensure the request follows the stated guidelines.
  - iii. Occasional requests will also need to be reviewed by the Scientific Testing Committee, which will review requests after curatorial review and prior to HRC review.
  - iv. The HRC will review research requests on a monthly basis.
  - v. Standard research requests require researchers to submit their requests in advance of their anticipated visit. The advance notice required for use of Human Remains in research is set by the HRC.
  - vi. Further information for research procedures is detailed elsewhere in this document, as well as the Museum's **Access to Collections Policy**.
- c. Exhibition Review:
- i. During the exhibition development process, the exhibition design team must submit requests for inclusion of human remains to the HRC in advance of the opening of the exhibition. The advance notice required for use of Human Remains in exhibits is set by the HRC.
  - ii. The HRC will schedule a review meeting with the exhibition design team on an as-needed basis.
  - iii. Further information for exhibition procedures is detailed elsewhere in this document.
- d. Image Use Review:
- i. Requests must be submitted prior to use if an image is determined to be necessary for teaching, research, education, or another task related to the museum's mission. The advance notice required for use of images of Human Remains is set by the HRC.
  - ii. The HRC will review image-use submissions on a monthly basis or on a schedule determined by the HRC by-laws which takes

- into account both the need to respond to requests in a timely manner and the requirements of possible external stakeholders.
- iii. Further information for image-use procedures is detailed elsewhere in this document.
6. The Chair of the Committee is responsible for documenting all review processes and ensuring procedures are followed.

## Appendix B: Human Remains Training

*The following description of the Human Remains Training is provisional; a separate group has been convened by the Director of Collections to develop this training. The present version of Appendix B reflects initial deliberations of that group.*

1. Anyone approved to work directly with human remains must complete a virtual Human Remains Training, which includes:
  - a. History of human remains at the Penn Museum.
  - b. Review of relevant legal and ethical codes.
    - i. Standard references to include:
      1. North American Graves Protection and Repatriation Act (NAGPRA)
      2. American Anthropological Association (AAA) Ethics Statements
      3. American Association of Biological Anthropologists (AABA) Code of Ethics
      4. Society for American Archaeology (SAA) Statement Concerning the Treatment of Human Remains
  - c. Handling protocols and respectful practices, including stewardship and conservation concerns for human remains.
    - i. Specific points of reference for trainings can include:
      1. "Human Remains," editors Vicki Cassman, Nancy Odegaard, and Joseph Powell.
      2. "Preventative Conservation: Collection Storage," editors Lisa Elkin and Christopher Norris.
  - d. Protocols surrounding intellectual property and photography.
  - e. Review of Penn Museum Human Remains Policies and Procedures documents.
2. Documentation of all trainings will be retained by the Chair of the HRC.
3. Consideration should be given to whether this training should require periodic repetition.

## Appendix C: Images of Human Remains

1. Images of human remains are frequently used in research, educational, and exhibition settings (considerations for use of images in exhibition contexts are considered in section 4.5).
2. Images may be considered for use if their inclusion meets the following criteria:
  - a. The use of the image is an important part of the research, coursework, presentation, or narrative of the exhibition or gallery and an alternative, such as a drawing, is not available.
  - b. The source and/or descendant community practices and cultural norms are considered when using the image.
  - c. Views and sensitivities of the audience are considered.
  - d. Best efforts are made to tell the story of an individual, individuals, and/or their community to the fullest extent possible in order to humanize them.
  - e. Individuals in the image are to be treated with respect throughout the process.
  - f. A warning is provided prior to encountering the image.
3. Once specific images of human remains have been approved for use, they do not need to be reviewed again by the HRC.
4. Images of human remains are not approved for display on Museum social media or other Museum communication channels. Exceptions to this must be approved by HRC.
5. The Museum will not normally approve the use of images of human remains for media requests. Exceptions may be reviewed by the HRC.

## Appendix D: Locations

1. In addition to assigned collections storage rooms, as referenced in section 1.5, Storage, Human remains may be used for research, education, and teaching in the following spaces (provided the use of these collections adhere to the remainder of the Human Remains Policy, and any other applicable Museum guidelines):
  - a. Academic Wing Rooms 329, 330, and 345
  - b. CAAM Classroom 190
  - c. Mainwaring Wing Rooms 304 and 404
  - d. Museum Classrooms L1 and L2
  - e. Museum Laboratory spaces, such as the Conservation X-Ray Suite, CAAM laboratories, and Anthropology laboratory spaces.
2. Any location utilizing remains must be marked with temporary signage advising entrants about the presence of human remains.
3. Remains must be stored in an approved manner, either inside a cabinet or in an opaque container, when not in use.
4. Human remains must be stored in Biological Anthropology or Registrar storage rooms overnight. Material used on consecutive days will need to be transported from storage to research space on a daily basis.
  - a. Any deviation from this must be approved by the Director of Collections on a case-by-case basis and recorded by the Registrar's Office.