

**SUMMARY* OF COMMENTS/QUESTIONS SUBMITTED TO ARIZONA STATE MUSEUM (ASM)
AND RESPONSES OFFERED AT CULTURAL RESOURCE MANAGEMENT FORUM (13 JUNE 2017) AND
ARIZONA HISTORIC PRESERVATION SESSION (15 JUNE 2017)**

- Thank you for listening. Thank you for creating a forum to hear the concerns of the cultural resource management community.
- Stakeholders appreciate ASM’s commitment to a two-day turn-around in issuing quotes.
- Will in-perpetuity fees be stable for the foreseeable future?
 - Yes. ASM will have to go through the Senate Bill 1418 process in the future to increase rates and fees. This will provide all stakeholders with time to comment and to prepare for any potential increases.
- Will there be refunds if projects are cancelled?
 - Yes. Refunds, however, (in most cases) will not be 100 percent, as ASM will incur some costs that must be recovered.
- What constitutes a “material change” in project scope?
 - At the present time, ASM proposes using a threshold of plus or minus 10 percent.
- The scale of the increase in costs is particularly difficult to deal with, given that it is so sudden.
 - ASM had originally planned to make its proposed new rate and fee structure effective as of 1 October 2017. Based on feedback from stakeholders and ASM’s desire to achieve better alignment between its business practices and the needs of stakeholders, the new proposed rate and fee structure, if adopted by the Arizona Board of Regents, will not go into effect until 1 July 2018.
- Curation costs could potentially outstrip other project costs. Will ASM and other agencies accept smaller samples in data recovery?
 - ASM’s extant regulations and policies represent *de facto* acceptance of the premise that, if cost is an issue, archaeologists should excavate smaller samples but submit for curation all items collected (except mass-produced objects).
- There should be a community discussion about a proposed “two-tiered” approach to archaeological sites (i.e., some sample of a site from which resulting collections are curated entirely and a sample that is subject to culling or some other procedure that limits the size of collections).
 - ASM will be happy to help organize and participate in this discussion.
- What opinions do Arizona tribes have regarding the prospect of smaller data recovery samples?
 - ASM has had preliminary discussions with tribal representatives through the museum’s Southwest Native Nations Advisory Board, will follow up in a meeting with the Four Southern Tribes in July, and is planning a tribal meeting to be held in August, in Prescott. Initial feedback suggests that tribes see value in encouraging more avoidance of sites in the context of the proposed new rate and fee structure. They also see value in encouraging and supporting compliance with the Arizona Antiquities Act and the state’s human burial protection statutes.
- ASM should sponsor a state agency forum.
 - The Arizona Department of Transportation has offered to host such a forum and planning is underway for a session to be held in late July, in Phoenix.
- Will ASM (as it has in the past) hold workshops on how to properly prepare collections to be submitted for curation? This will help stakeholders by saving time and money.
 - Yes. ASM will offer another series of these workshops, in southern, central, and northern Arizona.

***This document replaces a partial summary posted earlier.**

- One stakeholder suggested that ASM should be afraid that funds collected to cover curation costs in perpetuity may be “swept” by the legislature.
 - The University of Arizona (UA) uses interest-bearing accounts for many different kinds of projects and services. This is a new funding model in the cultural resource management field but not at UA. This is a common business tool, and without it, ASM will not be able to cover costs/provide services. Furthermore, the majority of funds collected for curation costs will be mirrored on the books by a liability (unearned revenue), which will not be completely amortized for approximately 180 years from the time of collections intake. Were these funds to be swept, a substantial unfunded liability would result. This would be fiscally irresponsible, and is highly unlikely, as only unencumbered cash is ever subject to such “sweeps.”
- One stakeholder suggested that there were other financial tools (aside from the perpetuity due model proposed by ASM) that would meet ASM’s needs at a lower cost to project proponents.
 - ASM asked for details on such a model, so that it might be considered in the SB 1418 process, and suggested that the stakeholder send them in written form. The stakeholder did not provide any details in person and, to date (10 August 2017), has not submitted any written information about an alternative funding model for covering costs in perpetuity.