



# COLORADO COUNCIL OF PROFESSIONAL ARCHÆOLOGISTS

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## NEWSLETTER

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VOL 8, NO. 4

DECEMBER 1986

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### PRESIDENT'S CORNER

by Susan M. Collins

The U.S. General Accounting Office has issued a fact sheet summarizing the results of a questionnaire submitted to the various State Historic Preservation Officers (SHPOs):

Cultural Resources, Results of Questionnaire on State Historic Preservation Activities, GAO/RCED-86-60FS. U.S. General Accounting Office, Gaithersburg, Maryland; 1985. 27 pages, free publication.

Prepared at the request of Representative John F. Seiberling, Chairman of the House Subcommittee on Public Lands, the publication attempts to encapsulate the various responses made by SHPOs to questions about the effectiveness of their programs and the compliance track records of specific federal agencies.

It comes as no surprise that the SHPOs uniformly stated that federal cutbacks have hurt their programs, and that they believe that they are doing the best possible job given budgetary and personnel constraints. It does seem odd that the SHPOs did not agree on which agencies are doing a particularly good job of compliance -- or a particularly poor one, for that matter. To quote directly:

"The SHPOs were less consistent in their assessments of the federal agencies' performance in fulfilling historic preservation responsibilities. Some SHPOs believed agencies such as the Department of Housing and Urban Development and the Army Corps of Engineers were poor performers while others believed these same agencies were especially good performers. Further, some SHPOs recognized that the quality of agency performance varied by location or installation within the same agency. For example, the Idaho SHPO identified one Forest Service unit as doing an especially good job and another unit as resisting compliance at every turn."

All of which goes to show how difficult it is to tell the good guys from the bad guys in this business.

Season's Greetings!

### ANNOUNCEMENTS

#### 1987 CCPA ANNUAL MEETING INFORMATION

The Ninth Annual Meeting of the Colorado Council of Professional Archaeologists will be held March 6 and 7, 1987 at Fort Lewis College in Durango, Colorado. Professor Susan Riches is coordinating the local arrangements.

Papers are being solicited from all members and their associates. Topics may include matters pertaining to archaeology within the state of Colorado and/or adjacent states. Titles and abstracts for papers should be sent to Susan Collins, P.O. Box 84, Mesa Verde National Park, Colorado 81330 no later than February 15, 1986. If you expect to be needing audiovisual equipment please notify Susan Collins at the above address or Susan Riches at Fort Lewis College.

Committee chairmen are also being requested to prepare reports for presentation at the Business Meeting.

The Strater Hotel in Durango is holding a block of rooms and is offering a somewhat reduced rate for registrants who sign up by February 19 1987. The Strater is a picturesque Victorian hotel which should appeal to those with a bent for history. A bit expensive, but lots of atmosphere, a good restaurant, and a Gay 90's style bar. Enclosed with this Newsletter is a registration card which will entitle you to the special rate. Considering the going rates in local hotels/motels, this is not a bad deal. For those choosing to seek other accommodations for whatever reason, a list of other possibilities will be included in the February 1987 Newsletter, along with suggested eating places and watering holes of which Durango has a goodly number. Please note, however, that the CCPA Meetings will be held during the ski season and the spring break for some colleges (including Fort Lewis College), so it is not a bad idea to give the Hotel Strater's offer serious consideration.

EDITORIAL

Archaeologists have never impressed me as being overly fastidious. In fact, there has always been a strong element which gloried in rustic behavior, primitive traditions, and raucous humor. So it strikes me as rather odd that despite a fair amount of scatological humor enjoyed by members of our profession, on the whole, archaeologists have difficulty in dealing linguistically with certain objects which are sometimes encountered in the field. They can certainly call a spade a spade (or at least a shovel), but they resort to a number of strange euphemisms when faced with certain biological substances.

This problem was brought to mind as I read the CCPA Guidelines for Curation Standards and Procedures which are published in this newsletter. In these I found a reference to "coprolites". Now this is not an unusual term, and certainly it is scientific and fairly unoffensive, but is it a correct term? I first encountered the word in an introductory course in geology where I understood it to refer to a kind of fossil. In checking Webster's Unabridged I find that it is still defined as "fossil dung or excrement". That word, fossil, is what bothered me, so I looked that one up as well, and found that it still does mean "any impression or trace of an animal or plant of past geological ages which has been preserved in the earth's crust". This seems to me a geological definition which refers to very ancient and definitely fossilized material. What we archaeologists encounter, however, is not normally fossilized nor from past geological ages, but is more often than not painfully recent. So maybe "coprolite" is not a term we ought to be using. What then do we call that stuff? I have sometimes seen and heard "fecal matter". That is what it is, no question about it, but this sounds stilted and awkward, and slightly evasive. (I rarely hear "osseous matter" or "vegetal matter" or even "lithic matter", at least when more directly descriptive terms are available).

What all of this comes down to is that we clearly lack a proper term for dealing with one of the most mundane substances we ever encounter, and are forced to resort to all manner of odd circumlocutions to get on with our descriptions and discussions. At the same time, it seems ironic that one of our most common expletives, and one which is probably as basic as any to the vocabularies of most archaeologists, communicates the idea clearly and unequivocally, and is, if anything, much overused. It poses a real dilemma, and I just wish someone could solve it. Maybe someday someone will come up with a comfortable, accurate, and acceptable term. Until then I guess we are all just fecally out of luck.

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WHAT'S NEW(S)?

This is a newsletter and is supposed to be a means of distributing news to the membership of CCPA. It is pretty difficult to do that, however, if nobody provides any news. So far there has been a lot of backlog to keep this year's issues full, but, folks, the well is running dry. Certainly there must be somebody out there doing something of interest to the other members of this organization. Why not grab a postcard and jot down a brief description of what you are currently engaged in? One of the best things this Newsletter can do is to help members keep in touch. The once a year meeting helps, but we tend to lose contact through the rest of the year. So how about a few contributions? Just send them to the Editor and we will do the rest.

THAT'S JAKE



"Let me guess who brought the individually wrapped slices and the half-gallon of Thunderbird."

CCPA NEWSLETTER

Published quarterly by the Colorado Council of Professional Archaeologists. Editor: Jack E. Smith, P.O. Box 84, Mesa Verde National Park, Colorado 81330.

There are two documents of interest attached to this issue of the Newsletter. One is the Minutes of the Eighth Annual CCPA Meeting held in Fort Morgan in March 1986. The other is a draft of a set of Guidelines for Curation Standards and Procedures. The latter is the product of a committee formed last year, and the draft guidelines were distributed during the March meeting for comments. They are reprinted here to refresh your memory and to further encourage your comments and suggestions.

Here are a couple of announcements which may be of interest to those of you seeking employment or other support from the federal government:

#### INTERNSHIPS AVAILABLE

Interested upper level undergraduates and graduate students are invited to learn about the role of archaeology in the Federal Government. Internships are available at the Office of Public Affairs, Society for American Archaeology and in the archaeological divisions within Federal agencies such as the National Park Service, United States Forest Service, and the Army Corps of Engineers. These internships provide opportunities to work on publications, learn about policy research, and participate in lobbying activities. These positions also provide the opportunity to establish a network for job opportunities in all Federal agencies as well as in the private sector.

Please direct inquiries to:

Kathy Reinburg, Director  
Office of Public Affairs,  
Society for American Archaeology  
2000 P St NW, Suite 305  
Washington, D.C. 20036  
(202) 833-2322

#### NEW PUBLICATIONS AVAILABLE

The Society for American Archaeology is introducing a new series of publications entitled ARCHAEOLOGY AND THE FEDERAL GOVERNMENT PUBLICATION SERIES. Three volumes are new available:

Vol. 1. THE BRIEFING BOOK ON ARCHAEOLOGICAL ISSUES The foremost authority on current archaeological issues on the federal level, this valuable reference is updated on a monthly basis to keep subscribers abreast of the latest developments in the issues being tracked. Issues are currently being tracked in six broad areas: appropriations, cultural properties/looting, land management, government organization, research, and public outreach. New issues and areas are added as they emerge as well as in response to subscriber requests.

\$150.00

Vol. 2. THE POLITICS OF ARCHAEOLOGY This volume contains essential information on what you can do to increase your influence and the political power of archaeology in Washington. In addition, it also provides material on the archaeology programs at many of the federal agencies including the scope of their programs, the sources of funding, the key legislation they operate under, and who the key people are in the programs. Appendices contain lists of Congressional members and staff, committees and subcommittees, federal agencies, and cultural resource lobbying groups.

\$18.50

Vol. 3. THE PROCUREMENT OF ARCHAEOLOGY Specifically written for those interested in a primer on obtaining funding from the federal government, this volume provides information on procurement law and proposal preparation.

\$7.00

All proceeds from the sales of these volumes will go to support the Office of Public Affairs, Society for American Archaeology. To order, send cash, money order, or check to:

Office of Public Affairs  
Society for American Archaeology  
2000 P Street, NW Suite 305  
Washington, DC 20036

MEMBERSHIP UPDATE

The following are additional names of members who have paid their 1986 dues. Please add these to the list published earlier this year.

Steve Baker  
Centuries Research Inc.  
P.O. Box 1869  
Montrose, CO 81401  
(303) 249-2283

Robert Biggs  
Archaeological Consultants  
2803 Mesa Avenue  
Durango, CO 81301  
(303) 259-1930

David Breternitz  
P.O. Box 592  
Dove Creek, CO 81324

Michael Burney  
Western Archaeological Consultants, Inc.  
P.O. Box 7063  
Boulder, CO 80306  
(303) 449-5722

Frank Eddy  
3443 Cripple Creek Square  
Boulder, CO 80303

Jonathan Haas  
School of American Research  
Santa Fe, New Mexico 87501

Stephen Kalasz  
124 Arapahoe St.  
Golden, CO 80401

Mike Nowak  
Dept. of Anthropology  
Colorado College  
Colorado Springs, CO 80903

Doug Scott  
1920 B Street  
Lincoln NE 68501

Margaret Van Ness  
124 Arapahoe St.  
Golden, CO 80401

Leslie Wildesen  
Archaeology & Historic Preservation  
Colorado Historical Society  
The Colorado State Museum  
1300 Broadway  
Denver, CO 80203  
(303) 866-2736

Please note also the following changes of address:

Adrienne Anderson  
1440 South Kendall St.  
Lakewood, CO 80226

Debra M. Angulski  
3441 E. 2nd Ave.  
Denver, CO 800206

Marcia Kelly  
1373 Fillmore  
Denver, CO 80206

Penny McPherson  
P.O. Box 305  
Billings, MT 59103

Anyone who has not paid their 1986 dues is urged to do so. It will soon be 1987 and it will be coming up again, so don't get any farther behind. Send your check to the CCPA Treasurer:

Gail Firebaugh  
Box 2127  
Boulder, CO 80306

Note that we have a new Treasurer for CCPA. Mark Guthrie had to resign from that position because of other commitments, and Gail Firebaugh has agreed to take over for the remainder of Mark's term.

NOTE: There is a photograph of the Strater Hotel on page 70 of the January/February 1987 issue of Historic Preservation.

*The gentle journey  
jars to stop,  
The drifting dream  
is done  
And now we'll walk  
As men have walked  
Through years not  
yet begun.  
For Christmas is a  
nightlong hope  
And Hope the search  
of years.  
The gentle journey  
wanders on  
With laughter, love  
and tears ---*

HAPPY HOLIDAYS TO YOU ALL . . .

MINUTES OF THE EIGHTH ANNUAL MEETING  
COLORADO COUNCIL OF PROFESSIONAL ARCHAEOLOGISTS

The 8th annual meeting of the Colorado Council of Professional Archaeologists was held March 14, 1986, at the Morgan Community College, Fort Morgan, Colorado.

Announcements

I. It was announced that the present and newly-elected executive committee members would meet during lunch today.

Call to Order

II. The meeting was called to order by President Sigstad at 10:00 a.m.

Officers Reports

III. a. President - Steve Sigstad reported that during the past year the executive committee had authorized \$50.00 to be donated to the Society for American Archaeology for the Crabtree Award. Ivol Hagar, among others, was nominated to be a recipient of the award. A letter was drafted and sent to the Chancellor of the University of Denver concerning the fate of archaeological collections in anticipation of the demise of the Department of Anthropology at the University. Receipt of the letter was not acknowledged, and the situation at the University of Denver has settled somewhat. A committee was formed to express CCPA concerns about protection of archaeological resources at the Pinon Canyon Manuver Site. A field trip by the CCPA committee to view sites at Pinon Canyon was enlightening as to the activities there. Three additional committees were established during the year to study curation standards acceptable to CCPA, reburial policy and procedures and the creation of a Ward Weakly Memorial Scholarship, respectively. A joint meeting with the Wyoming Association of Professional Archaeologists in the fall of 1985 was successful, and CCPA was encouraged to hold other joint meetings with neighboring professional organizations. The executive committee of CCPA held a special meeting to draft a set of comments to the Executive Director of the Advisory Council on the proposed revisions of the 36CFR800 regulations. A set of comments was transmitted to the Executive Director in December. A copy of the comments is available for review by CCPA members. Thanks are extended to the members of the executive committee and the various standing and ad hoc committees and to Bob Nykamp for his efforts to organize the Ft. Morgan meeting.

b. Secretary - Sally Cole reported that there were two sets of minutes to consider. The minutes from the 7th annual meeting were published in the newsletter, Vol. 7, No. 3; there was an unanimous vote to dispense with the reading of those minutes, and they stand as published. The minutes of the 1985 joint meeting of the Wyoming Association of Professional Archaeologists (WAPA) and CCPA as submitted by Mary M. Hopkins, Secretary of WAPA, were read to the membership. The vote was unanimous to accept the minutes as read.

c. Treasurer - Mark Guthrie reported that there was a 25% drop in CCPA funds in 1985 and a 20% drop in registration for the annual meeting. The trend has continued into 1986. A graph was exhibited showing the assets, receipts and disbursements between 1982 and 1986, and it was interpreted that CCPA is not really on a downturn financially. Rather, the number of people joining CCPA and registering for and attending the annual meetings was down from the all time high of the 1984 meeting in Boulder. A reported 40 people, to date, paid dues for 1985-1986, and 30 people pre-registered for the 1986 meeting. The CCPA books will close on March 31, 1986, and dues should be paid by then. CCPA funds were projected to be at the \$6000.00 level in 1986; the funds are invested in a money market fund paying an average of \$20.00 interest per month. Total expenses for 1985-1986 were \$709.00, which is higher than

usual. Expenses included the purchase of stationery, a cash box and name tags, totalling about \$100.00. Newsletter expenses were \$260.00. There were also expenses leftover from the 1985 meeting and some associated with Pinon Canyon inquiry and the WAPA joint meeting. There was a reminder to the membership to pay dues and that bad checks were a problem and cost the organization when they bounce. The extra costs will be passed on the check writer in the future. There has been a problem with the communication between the membership committee and the treasurer concerning the voting status of new applicants for membership. That information needs to be transmitted to the treasurer so that applicants can be informed in a timely fashion.

#### Standing Committee Reports

IV. a. Membership - Jenny Anderson recommended that a new and more active committee be appointed. Steve Sigstad agreed to work with President - elect Susan Collins on the appointment of a new membership committee.

b. Nomination - Paul Nickens reported that no nominations were received from the membership for this year's election. A slate of officer candidates was presented by the committee. A total of 45 ballots were returned which represented over 50% of the membership. Only one ballot was returned without identification. Generally, the races were close.

The following are results of the 1986 election:

Vice President and President - elect - Marcia Tate  
Secretary - Victoria Sounart  
Treasurer - Mark Guthrie  
Board Members - Mike Nowak  
                              Brian O'Neil

It was noted that Mark Guthrie agreed to run unopposed for a second term as treasurer because of a late start with the books.

c. Ethics - The ethics committee had no report.

d. Newsletter - Alan Reed, editor, reported that four newsletters got published in 1985 -1986, and the average cost per newsletter issue was \$66.00. He announced the termination of his editorship and thanked Steve Sigstad, Leslie Wildesen, Marcia Tate, Mark Guthrie and others who had been helpful. It was urged that members support the next editor with contributions of articles and information.

#### Special or Ad Hoc Committee Reports

V. a. Pinon Canyon Committee - Jim Grady reported that the committee was formed in response to concerns about protection of archaeological resources at the Pinon Canyon Manuver Site. The committee membership was named: Jim Grady, Jeff Eighmy, Steve Sigstad, Ivool Hagar and Bob Nykamp. A summary of the activities of the committee including a visit to impacted sites was presented.

A written version of the summary as submitted by Jim Grady, Steve Sigstad and Ivool Hagar is attached to the 1986 minutes.

There was a general discussion from the floor following the committee report.

b. Curation Standards Committee - Sarah Nelson reported that the committee had met with several people to discuss standards. The committee had prepared a draft of guidelines for curation standards and procedures which

was based, in part, on a curation standards document that was developed by a Texas counterpart of CCPA. The main concerns of the CCPA draft were the accessibility and security of the collections. Copies of the draft were passed out to members and comments were requested.

Bob Nykamp recommended from the floor that the guidelines be published in the newsletter. Steve Sigstad requested that a copy of the guidelines be given to the new newsletter editor.

c. Reburial Policy Committee - Paul Nickens stated that there was no formal committee report, but he would make some comments concerning the status of the reburial inquiry. No committee has been formally set-up, but information on the issue has been collected. Originally, it was felt that no policy should be proposed until the SAA had acted on the issue. However, it is unlikely that the SAA will develop really useful guidelines and will probably only issue a resolution. Any working solution will have to be developed on a state or regional basis. The special session on reburial policy to be held tomorrow as part of the CCPA meeting will bring together different perspectives on the issue and will serve as a prelude to taking steps to solve the problem.

d. Ward Weakly Memorial Scholarship Fund - Polly Hammer reported that she had talked with the University of Colorado Foundation about contributions and dispersement of funds for a scholarship, and she described the types of scholarships which could be established. One type was a dispersing scholarship and another was a permanent endowment which requires a \$10,000.00 minimum contribution. The status and number of individuals to be awarded scholarships can be determined as can the size of the award(s). There were comments from the floor from Sarah Nelson who felt that CCPA should not select a particular institution and from Alan Reed who suggested that, in lieu of an expensive scholarship, archaeological books could be purchased and distributed across the state. Paul Nickens proposed the establishment of an award rather than a scholarship, a fellows - type award for meritorious service by professional archaeologists. Susan Collins reviewed past executive board decisions on an award for fellows and proposed that it might result in conflict or factionalism among the professionals. She supported an award in scholarship form. Polly Hammer proposed to work-up a questionnaire to serve as a forum for ideas on the Ward Weakly award/scholarship fund.

#### State Archaeologist Report

VI. a. Announcements - Leslie Wildesen announced a job opening at Metro State College for an archaeologist and a lecture by Steve Manning. She also announced that she had received no comments as a result of letters sent to various CCPA members concerning two proposed conferences on rock art in southeastern Colorado and on vandalism to sites in the 4-Corners area. Another announcement was that the SAA - SOPA conference on reburial resulted in a draft report and copies are being sent to conference members.

b. Report - Leslie Wildesen reported that changes in the State Archaeologist office have been regularly reported in the CCPA newsletter. The office is better integrated into the Historical Society, and major changes in the office are the addition of staff member, Claudia Nissley, to handle National Register nominations and to help with PAAC and the promotion of O. D. Hand to Assistant State Archaeologist. State Historic Preservation Office reorganization has resulted in better file search procedures. Files are easier to access routinely. Revised guidelines for archaeological reports will be in effect after April 1, 1986. The report review process has been revised to include a response letter on whether the reports are acceptable or not and give reasons. The 1973 regulations for the State Archaeology Act are being revised, and a draft will be published in June of 1986.

The principal focus of the regulations is the permitting process, and also addressed is treating non-state lands as if they are state lands at the request of the land owner. Comments on the draft stage received by the end of the month are welcome. There will be other opportunities to comment. There is danger of losing the state archaeology program because of Federal budget cuts, but if Congress does not act by April, money for the program will come in. Senator Armstrong has considered using specific language to protect cultural resources in the next Colorado Wilderness Bill. It was suggested that CCPA members write in support of Armstrong's effort. There was a general discussion from the floor on report guidelines.

#### Unfinished Business

VII. Problems with the University of Denver Department of Anthropology - Sarah Nelson stated that the Social Science Division had recommended the elimination of the Department of Anthropology, and the future is unknown. She requested that CCPA members write letters in support of retention of the department.

#### New Business

VIII. Bill Tate announced the upcoming Colorado Archaeological Society encampment at Twin Lakes near Leadville. He also announced that the Plains Conference would be held in Denver in November, and he would like for the CCPA executive committee to decide what contribution CCPA will make. It was suggested that CCPA sponsor the Earlybird Party on the first night of the event. Volunteers to help with the Plains Conference were requested to sign up. An announcement of the death of Alice Hamilton, prominent member of the Colorado Archaeological Society, was made. The meeting was adjourned at 12:00 noon by Steve Sigstad.

Respectfully submitted,

Sally J. Cole  
Secretary



COLORADO COUNCIL OF PROFESSIONAL ARCHAEOLOGISTS

GUIDELINES FOR CURATION STANDARDS AND PROCEDURES

I. Introduction

In light of the quantity of archaeological material collections and records being generated from archaeological investigations and the variability in accessibility and care for these materials and records, it is imperative that standards be established for facilities which assume the responsibility of permanent custodianship. It is therefore proposed that these guidelines be established. Facilities which accept the responsibility of curating archaeological collections and records and meet the standards will be designated as "Approved Archaeological Repositories" (AARs).

II. Standards and Procedures for the Approved Archaeological Repository

A Defining an AAR

- 1 An AAR must be an agency/institution which provides curation of material collections and records in a systematic and accessible manner.
- 2 Accessibility is defined as the availability of the collections and records for study by a researcher other than the original investigator.
- 3 Curation includes storage, preservation, documentation, and retrieval of archaeological collections and records.

B Responsibilities of an AAR

- 1 There should be a professional staff with specific knowledge of and experience in the fields of museology and/or archaeology.
- 2 There should be a manual which includes:
  - a Curation policies of the AAR
  - b Policies for loans of material collections and records
  - c A written loan agreement form
  - d Maintenance of internal security
  - e Written deaccessioning and dissolution policies

3 The Smithsonian trinomial system of site designation must be used. If another system is employed, it must be cross-referenced.

4 The facilities must:

- a Be structurally sound
- b Conform to public health and safety standards
- c Have burglar and fire alarm systems
- d Have adequate light for halls, stairways and exits, storage areas, work areas, and laboratories
- e Have an adequate environmental control system, including pest control
- f Have adequate space for collection curation to prevent overcrowding and ensure accessibility
- g Be maintained in good repair and inspected for irregularities

C Archaeological Collections and Records which may be curated

1 Archaeological collections may include the following materials: ceramic, lithic, glass, metal, synthetics, faunal, vegetal, coprolites, matrix samples, and soil samples.

2 Archaeological records must include:

- a State site forms to comply with state standards with accompanying USGS map section
- b Survey or excavation notes
- c Photographs/photographic log
- d Maps and mapping notes
- e Field catalogue of specimens
- f Results of analyses including consultant reports
- g Approved final report
- h Explanation of any cataloguing system used in the field or laboratory analysis
- i Letter specifying ownership of curated materials

3 Archaeological records may additionally include:

- a Microfilm, microfiche data, computer printouts, transcripts, and tapes
- b Copies of historic documents
- c Bibliographic records
- d News clippings, miscellaneous published materials

### III. Standards and Procedures for Submitting Collections and Records

#### A Repository

- 1 In choosing a repository, an attempt should be made to keep archaeological collections in the area of origin. Materials from the same site and the same project should not be separated and should be curated in the state of origin.
- 2 A curation agreement must be made with an AAR prior to fieldwork.
- 3 There should be a conference with the curator of the selected repository as to specific procedural, packaging, and grouping guidelines required by that facility.
- 4 A letter should be prepared which specifies ownership of curated materials and clarifies any legal responsibilities to be assumed by the repository.

#### B Collections

- 1 Archaeological material collections should be organized by site.
- 2 Artifacts should be cleaned, preserved, catalogued, and inventoried according to set guidelines.
- 3 Material collections must be accompanied by all documenting records, including a letter of ownership and a formal letter of transfer. An explanation of the field and laboratory systems must be provided.
- 4 Specimens needing special treatment, or valuable specimens, should be separated out and noted.
- 5 All specimens should be labeled individually in accordance with the accessioning, cataloguing, and labeling systems of the AAR.
- 6 A specimen inventory must accompany each collection. Analytical group designations on inventories should correspond to those used in the final report and on packaging.

## C Records

- 1 Archaeological records submitted for curation must be organized and in good condition. Each AAR will have its own format or guidelines for the organization of these records.
- 2 Original documents should be included unless an alternate agreement has been reached with the repository. These documents must be legible and reproducible. Special care should be taken to ensure that the secondary documents which are typed or written are accurate.
- 3 The records must meet existing state standards for site documentation.