When Tim Vitale first contacted me about doing this, he told me I was the only one he could think of that had worked in a regional center and private practice as well. I know this is not true, I do
not think I am in a unique situation, and I hope that some of my points will inspire others who have been in the same situations to add their opinions. The other thing that came to light as the six of us, including Tim, were having our conference calls preparing for this, was that, basically we were all saying the same thing, the points that we were pulling out and stressing really came to the same conclusion, particularly the points about the single standard as an ideal (Part One, II.C.). It is a noble ideal, and I think it stems from the notion that quality and value are often established in the eye of the beholder. You see this particularly in private practice, when an object is brought to you and you wonder why it was ever saved; but it has a lot of sentimental value to someone else. Furthermore, what is expendable today may be a treasure tomorrow or in the next century. However, the single standard is sometimes not possible to apply in daily operations when all the demands and variables in a regional center or private practice are considered. And I am speaking with only nine months experience as a private conservator. I am very new to it and I feel like I am groping my way through sometimes; but certain things do become immediately apparent. In both regional centers and private practice, particularly private practice, quality and value of objects is extremely diverse. Again, value is relative and often has to be qualified in terms of monetary, sentimental, aesthetic, and historic value.

Objects may come to us singly or in large groups. The conservators in both regional and private labs are under constant pressure to produce completed treatments and accumulate billable hours. It is often unrealistic to expect that all objects coming through these types of labs will be handled in the same way. The word in the section on the single standard that I think is ambiguous is "treat-
ment." I will use the same materials, equipment, and techniques in the actual conservation procedures for all the objects under my care, but the extent of preliminary consultation, written and photo-documentation, and complexity of treatment may vary greatly according to the quality and value of the object.

The key phrase in this section that allows a conservator to alter her or his approach to an object is "circumstances may limit the extent of treatment." In fact, much more is limited by circumstances. So often clients, whether private or institutional, do not want to pay for the time -- and therefore cost of a treatment -- that may be optimum for the welfare of the object. Paper labs in regional centers sometimes face a lack of work because works of art on paper are not considered as valuable as paintings and are not given as high a priority for conservation. More often than not, circumstances demand that not all objects be treated according to a single standard.

The second point that I would like to make is on the principle of reversibility. (Part One, II.E.) I would wager a guess that we all strive to use materials which are reversible. However, it is difficult if not impossible to avoid using techniques which cannot be undone. Subtle but permanent changes may be the result of a treatment which is absolutely necessary or in which the benefits outweigh the disadvantages. Techniques which immediately come to mind are: washing, where desirable chemical components may be removed from the paper and the paper surface may be altered; returning to plane, again where the paper surface or design layer surface may be slightly altered; and some examples of consolidation of a design layer where the type of support or mounting materials present would make future removal impossible. As Marian stated, I think
what is most important here is that the conservator should use his/her common sense and use restraint. I guess that would be a major comment throughout about some of the limitations the present Code of Ethics employs: that conservators really need to use their best judgement. If the Code of Ethics, the way it stands, is too lofty to attain in our everyday practice, then it needs to be made more general, so that it is realistic and we can incorporate it into daily methods and techniques.

The third point that I want to make is under "Obligations to the Public: Solicitation of Clients" (Part One, V.G.). This is a relatively minor point, but I am finding it restrictive in private practice. It states "It is recommended that solicitations be confined to discreet announcements in newspapers and magazines inviting clients. Direct mailings to individuals, museums and institutions may be construed as an attempt to solicit clients unethically." The section under "Advertising" (Part One, V.F.) also incorporates some other suggestions for using signs, advertising in newspapers, etc. I am finding personally that this section is also a bit restrictive. Sometimes direct mailings are the most practical and efficient method of informing and communicating with clientele over a large geographic area. If one works out of one's home, hanging a sign outside may be prohibited by neighborhood covenants. Ads in newspapers, magazines, and telephone directories may not be feasible for security purposes or may be prohibitively expensive. Again, this is a relatively minor point, but we are here today to talk about impracticalities in the Code of Ethics and its validity for a private conservator. Obviously, there will be situations where a direct mailing is inappropriate, but this should be left to an individual's discretion.
Under Part Two, IV. "Procedure[s] for Engaging in and Reporting of Examination and Treatment...": Comment on this section refers to my previous point regarding the sometimes necessary lack of a single standard in daily application. According to variables such as the desires of a client, their budget limitations, their assessment of the quality of the object, and the level of risk in treatment, all or only a portion of each of the six points of information required by the Code of Ethics may be included. As an example, consider Part Two, IV.A.3, "Description of materials, structure and method of fabrication." In the case of both a regional center and a private conservation practice, again, there seem to be severe restrictions on time and money, as well as the demands of the work load generally, exhibit scheduling, number of objects in a group to be worked on, cost of treatment, etc. Perhaps it sounds a little crass, and I do not want to say it boils down to these few elements only, but these limitations make things difficult sometimes, and they have to be taken into consideration. So that often the report, if the object requires it, may be very extensive and may run to several pages. Alternatively, it seems to be most often feasible to limit the gathering of information to only that which is necessary to do a safe and successful treatment.

Under "Report of Treatment" (Part Two, IV.C.1), the same holds true. A report may be lengthy or brief depending on the complexity of treatment, number of objects to be treated in a group, similarity of objects and conditions, etc. I do think it important to incorporate all pertinent details on products used and techniques. For instance, it is useful to be specific about the type of washing you perform, the type of water, and all that information which ultimately may be exceedingly helpful to a conservator in his/her assessment of the same object's condition in the future and which might be incorporated into subsequent treatments.
Under Part Two, IV.C.2, photodocumentation: again, extent depends on all the variables previously mentioned. Photography is an expensive portion of documentation. Some regional centers have a staff photographer which is an incredible help and certainly adds to the frequency and quality of photodocumentation. I think most private conservators do their own photography, which tends to add a great deal of time and expense, particularly when, as a private conservator, in addition to doing treatments, one is required to do the photography, bookkeeping, accounting, think about insurance, security, and innumerable other details which come up and consume a lot of time. But photodocumentation can be most useful as protection against a client's poor memory as to the previous condition of an object, not to mention the usefulness of photos as a continual reference for the progress and outcome of conservation treatment.

The last point, again, is relatively minor, but I think it exemplifies the failure of the Code of Ethics to incorporate all the specialities which are required to adhere to the Code. The last section is "Operating Safety Procedures..." (Part Two, VI.). Portions of this section are worded specifically for paintings and three-dimensional objects, with no mention of works on paper.

To summarize, I think much of the problem with the present Code of Ethics and Standards of Practice lies in the wording. The wording needs to be less restrictive, encouraging conservators to use common sense and restraint with the well-being of the object as the highest priority. The goals set forth should not be so lofty as to discourage application in routine procedures. There should also be some mechanism considered for the AIC membership allowing them to routinely reacquaint themselves with these professional guidelines so that we can consciously incorporate them into daily practice.