

ARCHAEOLOGICAL STANDARDS

Technical Guidance for Archaeologists in the State of Michigan



Guide 6 | www.michigan.gov/archaeology/

Data Confidentiality Standards

Revised: May 12, 2026

Archaeological sites are protected cultural resources because they are non-renewable and fragile parts of the human environment. In order to protect archaeological sites from looting and destruction, there are several laws and statutes that govern the protection of archaeological site location information. For example:

- Under the Michigan Freedom of Information Act (FOIA) archaeological site locations are confidential and exempt from public disclosure (MCL 15.243 Sec.13(1)o).
- Section 304 of the NHPA (36 CFR 800.11(c)) protects certain sensitive information about historic properties from disclosure to the public when such disclosure could result in a significant invasion of privacy, damage to the historic property, or impede the use of a traditional religious site by practitioners.
- 36 CFR Part 61 establishes the minimum professional qualifications for archaeologist. Michigan's State Archaeological Site File is accessible only to professional archaeologists who meet the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR Part 61).

The Michigan SHPO makes the following recommendations to consultants, researchers, and archaeological practitioners to ensure the protection of archaeological sites:

- Qualified professionals who conduct research in the State Archaeological Site File **must not disclose site locations on maps or other locational data** (such as map coordinates, addresses, or Township/Range/Section information) **to the public**.
- When site information is presented to clients for Section 106 and compliance purposes, qualified professionals must ensure that their clients are aware that archaeological site locations are protected and confidential. **Maps and documents must be marked with a statement of confidentiality.**
- Research requests for information from the State Archaeological Site Files that are not associated with Section 106 or other regulatory compliance processes must be accompanied with a statement/research design outlining the nature of the research (i.e., research questions), the intended use of the data, as well as the intended audience. Graduate students will need a letter of support from their advisor to access the site file.
- When site information is presented in technical reports or other documents, a **confidentiality clause** must be present in the front matter, to ensure that the report will not be circulated beyond the intended audience.
- If a report has both Archaeological findings and Architectural findings, SHPO asks for either separate reports or a redacted copy for the Architectural Survey files to maintain the confidentiality of archaeological site information.
- If publishing data from the Michigan Archaeological Site File, SHPO should be cited as the source of the data, and the author(s) must make maps low resolution enough to obfuscate precise site locations.
- SHPO data from the Michigan Archaeological Site File should never be input into general purpose AI platforms or large language models, as these are not secure or confidential. See SHPO [AI guidance](#).
- All researchers who use SHPO data are expected to submit copies of their research reports or publications to the Archaeological Site File. Please submit reports, as a pdf file, to the SHPO Senior Archaeologist. This request includes reports created for academic and due diligence projects.

⇒ Also submit shape files of the project and survey area, and shapefile files for each site in the project area following [SHPO geospatial data requirements](#).