

[Insert Campus Name / Branding]

## **CAMPUS REPATRIATION IMPLEMENTATION PLAN**

Prepared & Submitted [Insert Fiscal Year]

## Table of Contents

<b>TABLE OF CONTENTS.....</b>	<b>2</b>
<b>PURPOSE AND INSTRUCTIONS.....</b>	<b>2</b>
<b>CAMPUS INFORMATION .....</b>	<b>3</b>
<b>COMPLIANCE OVERVIEW .....</b>	<b>4</b>
<b>SCOPE OF COLLECTIONS .....</b>	<b>6</b>
<b>STATUS OF CAMPUS SEARCHES .....</b>	<b>7</b>
<b>COMPLIANCE STATUS.....</b>	<b>8</b>
<b>REPATRIATION PROGRESS.....</b>	<b>9</b>
<b>CUSTODY COLLECTIONS .....</b>	<b>10</b>
<b>REPATRIATION BUDGETS .....</b>	<b>12</b>
<b>REPATRIATION TIMELINES.....</b>	<b>12</b>
<b>APPENDICES.....</b>	<b>13</b>

## Purpose and Instructions

The California State University (“CSU”) is committed to respectful, timely, and complete repatriation of Native American human remains and cultural items in the possession or control of CSU campuses and full compliance with the legal requirements under the Native American Graves Protection and Repatriation Act (“[federal NAGPRA](#)”) and subsequent [regulations](#), and the California Native American Graves Protection and Repatriation Act (“[CalNAGPRA](#)”), and subsequent Assembly Bills [275 \(2019-2020\)](#) and [389 \(2022-2023\)](#). Federal NAGPRA was enacted to protect and restore human remains and cultural items to lineal descendants, Indian Tribes, and Native Hawaiian organizations (“NHO”). CalNAGPRA requires consultation with all California Indian Tribes, including Tribes without federal recognition. However, consultation under CalNAGPRA may not delay any deadline or timeframe prescribed by federal NAGPRA or impede the federal repatriation processes in any way.

The CSU Repatriation Implementation Plan (“Plan”) is a required report for all CSU campuses with custody, possession or control of holdings or collections that contain or may contain Native American human remains or cultural items. The Plan is utilized to report the campus’s repatriation efforts and the estimated timelines and budgets annually. Estimated timelines and budgets must be developed with the consulting parties. The Plan also requires reporting collections held in campus custody for federal and state agencies, local governments, private entities, or other institutions or museums, including other CSU campuses.

## Instructions

The Plan should be completed by staff assigned compliance responsibilities and oversight duties. Further, the Plan must be reviewed by the Campus NAGPRA Committee and the campus President or President's designee before submitting it to the Office of Tribal Relations ("OTR") in the Chancellor's Office on/by the imposed deadline or as requested. Please provide your answers in the **green fields**. Tab out of the last row in the tables to add more rows. If a longer explanation is necessary, include an appendix document referencing the table number or section. A template budget is provided. Compile and submit the appendix documents with the completed Plan. Submit the Plan to OTR via email at **nagpra@calstate.edu**.

## Campus Acknowledgement

*Please insert the name of your campus in the blank spaces below.*

The **\_\_\_\_\_** acknowledges that the Plan, timeline, and budget may need adjustments in response to requests for repatriation and/or newly located or discovered human remains and/or cultural items. The **\_\_\_\_\_** recognizes that successful repatriation outcomes require proactive efforts to locate and report campus holdings or collections, compile all relevant information and documentation, and conduct proactive outreach to culturally affiliated and potentially culturally affiliated Indian Tribes and California Indian Tribes without federal recognition to initiate consultation while being responsive to Tribal inquiries and requests. The Plan is a dynamic document that adjusts accordingly as needed. The **\_\_\_\_\_** will review and update the Plan periodically or at the request of OTR.

Report Prepared By	Preparer's Title	Preparer's Contact Phone & Email

## Campus Information

List the campus administrators, staff, and faculty, including their positions and roles within the campus structure, who are delegated repatriation-related responsibilities and duties and their percentage of time toward such responsibilities and duties. Include part-time administrative support, student workers, and faculty course buy-outs, and provide the percentage (may be approximate) of time or number of hours per week/month/semester/academic year.

Name, Title, Office/Department		% or hrs.
President's Designee		

Coordinator		
Tribal Liaison		

<b>Campus NAGPRA Committee</b>	
How often has the committee met over the past year and on what dates?	
If the campus committee has vacancies, provide a brief statement on the outreach efforts to seek nominations <b>since the last campus progress report.</b>	

<b>Does the campus have a public-facing NAGPRA/CalNAGPRA website?</b>	
If yes, provide the website link(s).	
If not, provide the expected date or timeline for launching a website.	
Who maintains the website to provide updates and check hyperlinked information?	

List federal NAGPRA/CalNAGPRA-related trainings, webinars, or other events attended <b>since the previous Plan.</b> Include the date, location, organizers, URL or brief description of the training.

<p><b>Please ensure campus contact information is current for these resources:</b></p> <p><a href="https://apps.cr.nps.gov/nagrapublic/Home/Contact">https://apps.cr.nps.gov/nagrapublic/Home/Contact</a></p> <p><a href="https://nagpra.calstate.edu/csu-contacts">https://nagpra.calstate.edu/csu-contacts</a></p> <p>Notify the Native American Heritage Commission (“NAHC”) via email at <a href="mailto:calnagpra@nahc.ca.gov">calnagpra@nahc.ca.gov</a></p>
---

## Compliance Overview

### ❖ Obtain Tribal contact information

The NAHC maintains the statewide list of CalNAGPRA Tribal contacts. The list includes only California federally recognized Tribes and Tribes without federal recognition. The NAHC updates the list frequently, if not daily; therefore, it is recommended that you obtain the most current version, especially if the list you have is older than a month. Email the NAHC at [calnagpra@nahc.ca.gov](mailto:calnagpra@nahc.ca.gov) to request the list.

For Tribes nationwide:

<https://apps.cr.nps.gov/nagprapublic/Home/Contact>

<https://www.nps.gov/subjects/nagpra/consultation-resources.htm>

❖ **Follow the federal NAGPRA *Steps to Repatriation***

[43 C.F.R. §10.9 Repatriation of unassociated funerary objects, sacred objects, or objects of cultural patrimony.](#)

[43 C.F.R. §10.10 Repatriation of human remains or associated funerary objects.](#)

❖ **Adhere to federal NAGPRA *Duty of Care* requirements**

❖ **Abide by federal NAGPRA deadlines and timeframes**

Pursuant to federal [NAGPRA 43 C.F.R. §10.10\(d\)\(3\)](#): No later than **January 10, 2029**, for any human remains or associated funerary objects listed in an inventory but not published in a notice of inventory completion prior to January 12, 2024, a museum or Federal agency must:

- (i) Initiate consultation as described under paragraph (b) of this [section](#);
- (ii) Consult with consulting parties as described under paragraph (c) of this [section](#);
- (iii) Update its inventory under paragraph (d)(1) of this section and ensure the inventory is comprehensive and covers all holdings or collections relevant to this section; and
- (iv) Submit an updated inventory to all consulting parties and the Manager, National NAGPRA Program ["NPS"].

**Federal NAGPRA 43 C.F.R. §10.9(a)(2) Summaries Submission Deadlines**

<b>Acquires Possession or Control of Cultural Items</b> (unassociated funerary objects, sacred objects, objects of cultural patrimony)	<b>Locates Missing or Unknown Cultural Items</b> (unassociated funerary objects, sacred objects, objects of cultural patrimony)	<b>Prior to 1/12/2024, a campus <u>must have submitted</u> a summary to NPS by:</b> By November 16, 1993; By October 20, 2007, acquired or located after November 16, 1993; After October 20, 2007, six months after acquiring or locating.
6 MONTHS AFTER	6 MONTHS AFTER	

**Federal NAGPRA 43 C.F.R. §10.10(d)(2) Inventories Submission Deadlines**

<b>Acquires Possession or Control of Human Remains or Associated Funerary Objects</b>	<b>Locates Missing or Unknown Human Remains or Associated Funerary Objects</b>	<b>Prior to 1/12/2024, a campus <u>must have submitted</u> an inventory to all consulting parties and NPS by:</b> By November 16, 1995 By April 20, 2009, acquired or located after November 16, 1995; After April 20, 2009, two years after acquiring or locating.
2 YEARS AFTER	2 YEARS AFTER	

## Scope of Collections

Provide the following information on collections in the possession or control of the campus (herein as “campus collections”) that contain or may contain Native American human remains or cultural items. **Do not include federal, state or local government agencies, private entities, other museum or institution collections in this section.** Collections that are held in the custody of the campus are addressed in the Custody Collections section. If the campus cannot identify any person, institution, state or local government, or federal agency with possession or control, the campus should presume it has possession or control of the human remains or cultural items for the purposes of repatriation under federal NAGPRA.<sup>1</sup> Further, these totals must include collections or individual items identified in campuswide searches that are or may be subject to repatriation laws.

**Table 1.1 – California County Collections**

Provide the number of accessions or sites for each CA county in campus collections **since the last campus progress report.**

CA county	Total # of accessions or sites	Are human remains present?	How many boxes/containers, cabinets/cabinet drawers or shelves?

**Table 1.2 – Campus Collections Map Updates**

Review the [Campus Collections Map](#) and provide updates **since the last campus progress report.**

ADD:	
REMOVE:	

**Table 2 – Out-of-State Collections**

Provide updates to out-of-state campus collections **since the last campus progress report.**

State of origin	Total # of accessions or sites	Are human remains present?	How many boxes/containers, cabinets/cabinet drawers or shelves?

**Table 3 – International Collections**

Although not subject to repatriation laws, such campus collections may be appropriate for international repatriation.

---

<sup>1</sup> <https://www.federalregister.gov/d/2023-27040/p-282>. The National NAGPRA Program required letters from campuses for such holdings or collections (43 CFR 10.8(d)).

Country/province of origin	Total # of accessions or sites	Are human remains present?	Is there a connection to a U.S. Tribe? If yes, how?

**Table 4 – Loans**

Provide information on campus collections currently on loan to internal and external borrowers (e.g., campus departments or museums, individuals (including students), Tribes, colleges/universities, including other CSU campuses and other institutions/museums).

Site or accession # and collection name if known	Borrower Name/Institution	Date loaned	Anticipated return date

**Table 5 – Missing Collections**

Provide information for campus collections that are known to be missing.

Site or Accession # and collection name if known	Brief description of the missing collection or item	Date of last known location

**Table 6 – Unprovenanced/Unprovenienced Campus Collections**

Provide the total number of Native American human remains or potential cultural items for which provenance or provenience is unknown.

	Total #
Human remains	
Cultural items	

Are there human remains that require an osteological review? If yes, provide the status and/or next steps.

**Table 7 – Reunifications**

Provide information on efforts to reunify human remains and/or cultural items from split collections with other CSU campuses and/or other institutions/museums/agencies/etc.

## Status of Campus Searches

Pursuant to CalNAGPRA §8028.7(a)(9), the CSU must annually report to the state Legislature systemwide progress in reviewing campus collections. As part of the campus's responsibilities in reporting holdings or collections, campuses must conduct campuswide searches to locate and account for

all holdings or collections that contain or may contain Native American human remains or potential cultural items. Provide the following information on the campus efforts to initiate and conduct campus searches.

### Table 8 – Campus Searches

Provide a list of campus searches initiated **since the last campus progress report**. Provide the individual department/unit/facility searched and the status of each. If completed, provide a summary of findings or attach a report as an appendix.

Date initiated	Department/unit/facility surveyed and/or physically searched	Status (in progress, completed). If in progress, provide an expected date of completion.	If completed, provide findings (here or as an appendix)

Please describe your campus search process. Attach a sample of the campuswide communications and survey tool used as an appendix.

Please share any issues or challenges in initiating, conducting or completing campus searches.

Please provide anticipated or planned campus searches. Include campus searches in the Repatriation Timelines and Budgets sections of the Plan.

## Compliance Status

### Table 9 – Consultation

List the Tribe(s) you are currently in consultation with or have consulted **since the last campus progress report**. You may instead attach a consultation record as an appendix but redact any confidential information as determined by the consulting parties. If unsure, do not include it.

Date	Tribe	# of accessions or sites	Accession or site CA county/counties or other U.S. state if not in CA	Status

Do you anticipate or are you experiencing any barriers to initiating or conducting consultations? If yes, please share them here.



--

**Table 10 – Inventories and Summaries**

Has your campus submitted federal NAGPRA inventories for all human remains and associated funerary objects in the campus's possession or control? If no, why not?

Has your campus submitted federal NAGPRA summaries describing collections in the campus's possession or control? If no, why not?

Has your campus submitted CalNAGPRA inventories for all human remains and associated funerary objects in the campus's possession or control? If no, why not?

Has your campus submitted CalNAGPRA summaries describing collections in the campus's possession or control? If no, why not?

## Repatriation Progress

**Table 11 – Repatriation Status**

Using the totals in published *Federal Register* notices, provide the repatriation totals of the human remains and cultural items repatriated **since the previous Plan**.

	Total # repatriated
Human remains	
Associated funerary objects	
Unassociated funerary objects	
Sacred objects	
Objects of cultural patrimony	

**Tables 12 & 13 – Federal Register Notices**

Provide the status of published notices **since the last campus progress report** in the respective tables below.

**Table 12 – Notice of Inventory Completion**

Fed Reg Doc Number	Notice Due Date	Contested Y or N	Joint Request for Repatriation (Tribes) Y or N	Joint Notice with an Agency Y or N	Repatriated Transfer of Control (recipient, date)	Repatriated Physical Transfer (recipient, date)	What is the NAHC status (Tribal Resources/Preliminary/Final)

Use this space to provide additional information on Contested, Joint Requests or Joint Notices.

**Table 13 – Notice of Intent to Repatriate**

Fed Reg Doc Number	Notice Due Date	Contested Y or N	Joint Request for Repatriation Y or N	Joint Notice with an Agency Y or N	Repatriated Transfer of Control (recipient, date)	Repatriated Physical Transfer (recipient, date)	What is the NAHC status (Tribal Resources/Preliminary/Final)

Use this space to provide additional information on Contested, Joint Requests or Joint Notices.

**Table 14 – Held-in-Trust**

List active agreements.

Lineal descendant, Tribe or NHO	Date Executed	Expiry Date	Associated Fed Reg Doc Number(s)

**Table 15 – Reburial**

Is the campus considering or in discussion about reburial on campus-owned land?

List active Campus Land Reburial agreements.

Lineal descendant or Tribe	Date Executed	Associated Fed Reg Doc Number(s)

## Custody Collections

Provide the following details for each collection held in campus custody in the respective tables. In the percentage column, provide an estimate of the percentage each custody collection represents within the

totality of the campus holdings. In the Contract? column, answer yes or no if a contract or agreement exists, and state if the contract/agreement is active or expired.

**Table 16 – Federal agencies**

Name	# Sites or catalog entries	%	Are human remains present? If yes, how many?	Was a <a href="#">10.8(c)</a> letter sent? If yes, give an update. If no, explain why.	Contract?

**Table 17 – State agencies** (include local governments, city and county, divisions, etc.)

Name	# Sites or catalog entries	%	Are human remains present? If yes, how many?	Was a letter sent?* If yes, give an update. If no, explain why.	Contract?

**Table 18 – Museums/Institutions** (include museums, other colleges/universities including other CSUs)

Name	# Sites or catalog entries	%	Are human remains present? If yes, how many?	Was a letter sent?* If yes, give an update. If no, explain why.	Contract?

**Table 19 – Private Entities** (include individuals, CRMs)

Name	# Sites or catalog entries	%	Are human remains present? If yes, how many?	Was a letter sent?* If yes, give an update. If no, explain why.	Contract?

\*Similar notification letters to the one required by the National NAGPRA Program that were due on January 12, 2025, were required by the Chancellor's Office to be sent to state, local government and other known entities with possession or control of collections in the custody of campuses on January 13, 2025.

<p>Has any of the above agencies, institutions/museums, or private entities requested the campus to act as its agent and/or conduct any compliance responsibilities? For example, transfer of legal control to the campus, initiate outreach to Tribes or NHOs for consultations, etc. <b>Also, are they providing funding?</b> Please attach a copy of the agreement/contract as an appendix.</p>

## Repatriation Budgets

Including the current fiscal year, provide a three-year budget outlining the campus's and/or foundation's actual or estimated allocated funds and resources. Include staff, materials, facilities, general office expenses, training, etc. Include funding received from the Chancellor's Office, funding from grants and monetary donations.

Budgets must specify the financial assistance available and needed for consultations, such as stipends, travel assistance, and repatriation costs, such as transportation and reburial assistance. **These expenses must be discussed and developed with consulting parties to ensure adequate funding is included and forecasted.**

The budget should not just have what is available with current resources, but the resources needed to complete repatriation in an efficient and streamlined manner, as provided in the Timeline below. In other words, if you need to hire five additional people to complete by 2029, then this should be in the budget.

The budget should include:

- A full list of the types of costs for which the campus proposes to provide funding and the total amount of funding that the campus would need annually to pay for such costs.
- The total amount of funding required annually to compensate Tribes for the time they spend in consultation.
- The total amount of funding required annually to compensate Tribes for reburial costs.
- An accounting of the amount of funding the campus has available to provide toward these costs and the amount of funding it needs, if any, from the Chancellor's Office or Legislature.

Please use the provided budget template and modify it as needed. Attach the budget as an appendix item.

## Repatriation Timelines

Including the current fiscal year, provide a three-year timeline of repatriation goals that are in progress and planned. **Repatriation timelines must be discussed and developed with consulting parties to ensure repatriation goals and benchmarks are mutually agreeable.**

Timelines are utilized to monitor campus repatriation progress; therefore, timelines should be updated as goals are either added, completed, extended or removed. A template timeline is included below, but you may use a preferred template and attach it as an appendix item.

Fiscal Year (July 1 - June 30)	Timelines	Description of Repatriation Goals/Benchmarks
1. Current FY		
2. 20XX – 20XX		
3. 20XX – 20XX		

## Appendices

Please list the attachment(s) submitted with the Plan below.

1. Definitions
- 2.

### **APPENDIX 1: Definitions**

The underscored text is hyperlinked to the definitions in federal NAGPRA (25 U.S.C. §3001 and [43 C.F.R. §10.2](#)).

**Accession:** The formal act of legally accepting a collection or item into a campus’s control and recording it in its records.

**Archaeological site (site):** A location of associated artifacts and features that shows evidence of human activity that is at least 45 years of age.

**California Indian Tribe:** As defined under CalNAGPRA §8012(c).

**Campus:** A state agency under the California State University system that includes all auxiliaries and is defined by federal NAGPRA [43 C.F.R. §10.2 “Museum”](#) and CalNAGPRA §8012(i).

**Consultation:** As defined under federal NAGPRA [43 C.F.R. §10.2 “Consultation or consult”](#) and CalNAGPRA §8012(e).

**Consulting parties:** As defined under federal NAGPRA [43 C.F.R. §10.9\(b\)\(1\)](#) and [10.10\(b\)\(1\)](#) and includes California Indian Tribes as defined in CalNAGPRA §8012(c) with potential cultural affiliation and authorized Tribal representatives.

### **Cultural affiliation**

**Cultural Items:** As defined under federal NAGPRA [43 C.F.R. §10.2 “Cultural items”](#) and CalNAGPRA §8012(g).

### **Custody**

### Duty of care

### Federal agency

**Indian Tribe:** As defined by federal NAGPRA 25 U.S.C. §3001(7) and [43 C.F.R. §10.2 "Indian Tribe."](#)

**Funerary objects** (associated and unassociated funerary objects)

### Holding or collection

### Human Remains

### Inventory

### Lineal descendant

**Museum:** The CSU meets the definition of a museum under federal NAGPRA [43 C.F.R. §10.2 "Museum"](#) and CalNAGPRA §8012(i).

### Native American traditional knowledge

### Native Hawaiian organizations (NHO)

### Objects of cultural patrimony

### Possession or control

**Private entities:** Any organization or individual that is not affiliated with a government or public body. This includes businesses, nonprofit organizations, partnerships, and individuals operating independently from federal, state or local control.

**Provenience:** The geographical location by county or State where the potential Human Remains or Cultural Items were removed.

**Provenance:** The acquisition history of the potential Human Remains or Cultural Items.

### Repatriation

### Sacred objects

**State agency:** Per CalNAGPRA §8012(a), means a division, department, bureau, commission, board, council, city, county, city and county, district, or other political subdivision of the state.

### Summary

Cost Category	FY26 Total Budget	FY27 Total Budget	FY28 Total Budget
Personnel (Salary & Benefits)			
Subtotal Personnel: # roles FTE; # roles PTE; # student roles <i>Includes salary, benefits and assumed rate increase. List of roles and description below table</i>	Total:	Total:	Total:
Non-Payroll			
Support for Consultations and Repatriation			
Tribal stipends: Travel for consultations, participating in transfer of items, monitoring in storage, onsite research for repatriation, reburial support <i>*Estimated at # to # visits per year</i>	Total:	Total:	Total:
Consultation Costs: Food, parking, supplies for consultations and repatriations	Total:	Total:	Total:
Rehousing preparations for reburial and storage materials	Total:	Total:	Total:
Transportation costs for return	Total:	Total:	Total:
Equipment to Support Consultation & Repatriation			
Vehicle Rental / Purchase	Total:	Total:	Total:
Equipment Rental / Purchase	Total:	Total:	Total:

Other Costs - NAGPRA Team			
Office supplies, mailing, furniture, computers, software, etc.	Total:	Total:	Total:
NAGPRA travel ( <i>training conferences; presentations; national/state meetings etc.</i> )	Total:	Total:	Total:
Resource materials, subscriptions, memberships, etc.	Total:	Total:	Total:
Subtotal Non-Compensation	Total:	Total:	Total:
Total Expenses	Total:	Total:	Total:
Closing Balance	0	0	0