**UC [CAMPUS]**

REPATRIATION IMPLEMENTATION PLAN

[DATE RANGE]

**[DRAFT/FINAL]**

[DATE OF DRAFT OR FINAL PLAN]

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# Introduction and Purpose

All UC campuses with NAGPRA/CalNAGPRA-eligible human remains or cultural items are required to develop a Repatriation Implementation Plan, in coordination with campus NAGPRA Implementation Committees. The purpose of the Repatriation Implementation Plan is to document how the campus will achieve repatriation.

The Repatriation Implementation Plan must include the following components, at a minimum:

1. Proactive Consultation and Review
2. Outreach to Culturally/State Affiliated Tribes
3. Collections Controlled by other Agencies
4. Budget Estimate
5. Campus Repatriation Plan Timeline

Upon finalization, the campus Repatriation Coordinator will provide the Repatriation Implementation Plan to the Systemwide NAGPRA Implementation Committees (See [UC Native American Cultural Affiliation & Repatriation Policy](https://policy.ucop.edu/doc/2500489/NAGPRA), Section VI).

The UC [**CAMPUS**] Repatriation Implementation Plan was developed to address the requirements under NAGPRA, CalNAGPRA and UC Policy. The Plan provides a framework to guide the campus repatriation work and provide timelines and benchmarks. The Plan focuses primarily on NAGPRA and CalNAGPRA Inventories. UC [**CAMPUS**] acknowledges that the Plan, its timeline, and budget may need adjustments in response to claims and/or newly identified human remains or materials.

UC [**CAMPUS**] recognizes that successful repatriation work needs to be both proactive in establishing appropriate documentation, consultation, and repatriation plans, as well as reactive and responsive to tribal claims, priorities, and requests. The Repatriation Implementation Plan should be a dynamic document that adjusts accordingly to the situation. UC [**CAMPUS**] will review and update the Plan annually or at the request of the NAGPRA Implementation Committee.

# Background

Scope

Describe the scope of current campus holdings, including:

* Where are collections physically held? Identify all museums, repositories, departments, buildings, reserve sites, etc.
* How were these collections originally obtained?
* Do collections primarily come from particular regions/counties/sites/areas affiliated to particular tribal communities?
* How many individuals, funerary objects, and cultural items does the campus currently hold? How many sites/accessions?
* What is the current status of these sites/accessions (awaiting consultation, invitation for tribal consultation sent, in consultation, CalNAGPRA inventory preliminary/final, federal Notice pending/final, etc.)?
* Do any collections lack sufficient provenience documentation to begin consultation? That is, what is likely to be truly CUI?

Include tables or graphics describing the above as appropriate, e.g.:

* # Human Remains (MNI), Funerary Objects (AFO/UFO), Sites by NAGPRA/CalNAGPRA status
* Tables or maps showing Site/Human Remains/Funerary Object totals by county

**Note**: Complete, detailed lists of accessions/sites should be included as appendices.

Compliance Overview

Describe the history of the campus’s compliance with NAGPRA/CalNAGPRA. For example:

* When did the campus first submit NAGPRA Inventories/Summaries to the National Park Service? What consultation efforts were carried out at that time, either in preparation of Inventories/Summaries or following their submission?
* Have new or updated Inventories/Summaries been submitted to NPS since initial submission? Were these submitted to address or correct any specific issues with the original Inventories/Summaries?
* What has been the campus’s rate of consultations, claims, and repatriations since that time? What problems or issues has the campus historically faced? For example, what percent of the collection was determined to be CUI? Did the campus engage in thorough consultation on these? Have previously denied claims been revisited?
* What is the status of submission of preliminary Inventories/Summaries to NAHC under CalNAGPRA? What consultation occurred in their preparation and what consultation efforts have occurred since then? Have Inventories/Summaries been successfully moved from preliminary to final state?

# Proactive Consultation and Review

UC policy requires all campuses review prior determinations in consultation with tribes. The UC Policy envisions this as a two-step process, first informing tribes of collections that may include Cultural Items and inviting consultation, and second, reviewing and updating previous determinations of Culturally Unidentifiable Human Remains and Associated Funerary Objects.

Describe the campus’s plan for proactive outreach to tribes to initiate consultation on collections that may include Cultural Items:

* How many tribes must be contacted? From what regions?
* What specific steps for outreach are underway or will need to be taken in order to initiate and complete consultation? What *specific* actions will need to occur?
* Approximately how long is this outreach estimated to take? What is the schedule? (Describe here and also include in Section E: Timeline.)

Describe the campus’s plan for proactively reviewing collections previously identified as CUI:

* What number/percentage of the campus’s collections were previously determined to be CUI? How were these previous determinations made? Were these original determinations made with or without tribal consultation?
* Describe the scope and nature of current CUI collections. How many accessions/sites/counties/regions include CUI? How many sets of Human Remains or other items do these collections include?
* What outreach efforts are underway or will need to be taken in order to initiate and complete consultation? What *specific* actions will need to occur?
* How long will these reviews take? What is the schedule for outreach to tribes? (Describe here and also include in Section E: Timeline.)

Does the campus hold other materials likely to be identified as sacred objects or funerary objects based on collections records? Do any of those objects include no or limited documentation? Describe how these will be included in campus consultation plans.

**Action Items:**

* Describe any specific action items that must/will occur and the schedule for completion of those actions.

# Outreach to Culturally/State Affiliated Tribes

The UC Policy requires “reaching out to Culturally Affiliated/State Culturally Affiliated Tribes that have not yet requested or taken possession of the affiliated Human Remains and Cultural Items to see how the campus can support them in these efforts and discuss a Stewardship agreement if the tribe is not able to physically accept the transfer.”

Describe the campus’s plan to reach out to Culturally Affiliated/State Culturally Affiliated Tribes:

* What is the current scope of campus collections for which repatriation can be completed, but for which claims have not yet been submitted?
* What is the current scope of campus collections for which repatriation *has* been completed, but physical transfer and/or reburial have not yet been completed?
* What specific, past or ongoing challenges have tribes identified as impediments to submitting claims or transferring legal/physical control of campus collections?
* Describe what resources the campus will provide to tribes in order to facilitate claims. For example, providing template claim letters, offering Held-in-Trust agreements for Stewardship following repatriation, or assisting with identifying reburial lands as appropriate and requested.
* Provide timelines/estimates for outreach needed to facilitate the transfer of control, and/or physical transfer.

**Action Items:**

* Describe any specific action items that must/will occur and the schedule for completion of those actions.

# Agency Controlled Collections

The UC Policy requires campuses conduct outreach to agencies who control human remains and cultural items held by the campus “to prompt and encourage those agencies repatriation efforts.”

Campuses are required to contact agencies at least annually and post a list of collections of a UC public facing website. The website must include a list of collections, county, agency, general description, and to the extent known general provenience and culturally affiliated Tribes.

Describe any campus collections in the legal control of other agencies and the campus’s plans for reaching out to those agencies:

* What non-UC agencies/museums have legal control of collections of Human Remains and/or Cultural Items currently located on the campus?
* Have these collections been posted on the campus website, per UC Policy? If not, what is the schedule for completion?
* Are any agencies known to be actively consulting with tribes on these collections? Provide timelines for legal/physical transfer, if known.
* Has the campus engaged with tribes regarding any of these collections? Is the campus aware of any tribal preferences that might impact their legal or physical return?
* Are there any known impediments? For example, is the campus aware of any legal or contractual obstacles? Have any of the agencies been particularly nonresponsive, or have agencies refused to engage with the campus in discussing these collections?
* Describe the campus’s plan for outreach to these agencies and resolving conflicts.

**Note:** Detailed lists should be included as appendices.

**Action Items:**

* Describe any specific action items that must/will occur and the schedule for completion of those actions.

# Budget Estimate

The UC Policy requires campuses estimate costs “necessary to carry out their responsibilities under this policy.” Budgets should specify financial assistance available to consulting tribes, such as stipends, travel assistance, or reburial assistance.

* Describe the current campus budget for repatriation, including itemized allocations for campus costs (staff\*\*, facilities management, supplies, etc.) as well as funds allocated for tribal support (meals, travel stipends, physical preparation/transport, reburial supplies, legal assistance for land agreements, etc.). \*\*Please describe staff positions/roles and how their contributions will facilitate repatriation.
* At current funding levels, what is the estimated timeline for completion of all repatriation activities at the campus? How were these figures determined?
* What specific new allocations or reallocations would better facilitate timely consultation, repatriation, and reburial? For example, an increase of *$x* to hire *x* staff and an increased allocation of *$x* for tribal support would facilitate *x* consultations over the next *x* years. How were these figures determined?
* From what sources does the campus intend to allocate funds for repatriation during future years?

Include summary tables and detailed calculations for each fiscal year.

Where appropriate, campuses should include cost estimates for full repatriation within various timelines (e.g., within 10 years if *$x* amount is available, and within 5 years if *$y* is available). Anticipated timelines and schedules should be described in Section E below.

**Action Items:**

* Describe any specific action items that must/will occur and the schedule for completion of those actions.

# Repatriation Plan Timeline

Provide an estimated timeline to complete repatriations and dispositions (transfer of control) of NAGPRA/CalNAGPRA-eligible collections. Include specific benchmarks (e.g., number or percentage of sites/accessions/human remains expected to be repatriated) for each year, as well as any specific tribes/areas/accessions or types of collections (human remains & funerary objects, CalNAGPRA summary items, collections likely to remain as CUI following consultation). **If multiple budgetary estimates are described in Section D above, provide anticipated timelines relating to each estimate.**

In order to accommodate claims and/or tribal priorities, timelines should be reviewed at least annually and revised as needed.

An example timeline is included below:

# Appendix

Include any additional information here (e.g., detailed lists of accessions/sites, lists of non-UC collections, supporting budgetary documentation, etc.).