

UW Campus NAGPRA Procedures

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Functional Owner: Office of the Chancellor

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I. Background

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On November 16, 1990, congress enacted Public Law 101-601, Native American Graves Protection and Repatriation Act (NAGPRA). The Act's purpose is to protect Native American burial sites and to regulate the removal of human remains, funerary objects, sacred objects, and objects of cultural patrimony that are located on federal, Native American, and Native Hawaiian lands. The Act provides a process for the return, upon request, of certain cultural items to their modern descendants, makes illegal the trafficking of those items, and sets forth procedures for the control of their excavation.

The University of Wisconsin is committed to respecting the values and beliefs of descendent communities and developing mutually beneficial partnerships and transparent discussion with Tribal nations through the consultation process.

The University of Wisconsin recognizes that it may hold culturally sensitive materials that contain important meaning to descendant communities, and/or that may be needed by religious leaders for the performance of present-day, ongoing, religious ceremonies. In 2024, campus policy UW-175, "Native American Graves Protection and Repatriation Act (NAGPRA) Compliance" was approved to facilitate compliance activities across campus. These procedures were created alongside the policy to establish and maintain instructions to campus units who are actively engaged in, or who could potentially manage, ancestral remains or cultural items as defined in NAGPRA. These procedures are maintained and enforced by the Campus NAGPRA Coordinator and may be updated as needed to reflect updated or new campus policies and procedures or to improve the efficacy of existing procedures. Please contact the Campus NAGPRA Coordinator to ensure you are accessing the most updated version of these procedures, before taking any action.

II. Purpose

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The purpose of this document is to provide guidance on how to implement campus policy UW-175, "Native American Graves Protection and Repatriation Act (NAGPRA) Compliance," associated UW System Administrative Policy, SYS 645, "Native American Graves Protection and Repatriation Act (NAGPRA) Compliance," and portions of Regent Policy Document, RPD 8-2, "Tribal Consultation," on the UW-Madison campus.

III. Definitions

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The following definitions have been included to clarify these comprehensive procedures. Most were drawn directly from the NAGPRA Regulations.

A. Agents/Entities:

Appropriate official (previously Authorized Tribal Representative): See [43 CFR 10.2 "Appropriate official"](#)

Curator: The manager and administrator of the collection, encompassing traditional roles of Registrar, Collection Manager, Archivist, Instructor, and more. See also Director.

Department Representative: Any entity (most often faculty, staff, or student) who acts on behalf of the University of Wisconsin-Madison Department of Anthropology, in any way.

Director: The manager and administrator of the collection, encompassing traditional roles of Registrar, Collection Manager, Archivist, Instructor, and more. See also Curator.

Indian Tribe: See [43 CFR 10.2 "Indian Tribe"](#). Also referred to as Tribal nation (per RPD 8-2 and SYS 645).

Lineal Descendant: See [43 CFR 10.2 "Lineal descendant"](#)

Museum: See [43 CFR 10.2 "Museum"](#)

Native American: See [43 CFR 10.2 “Native American”](#)

Native Hawaiian Organization (NHO): [43 CFR 10.2 “Native Hawaiian organization”](#). Also referred to as Tribal nation (per RPD 8-2 and SYS 645).

Ahupua’a: See [43 CFR 10.2 “Ahupua'a”](#)

Ohana: See [43 CFR 10.2 “Ohana”](#)

Person: See [43 CFR 10.2 “Person”](#)

Traditional Religious Leader: See [43 CFR 10.2 “Traditional religious leader”](#)

B. Collections/Holdings:

Artifact: An object that has been manufactured by humans. This term is most often used when describing ethnographic objects (like clothing) and archaeological objects (like projectile points).

Collection: An assemblage of objects (see “object”) organized by its primary purpose/use. For example, an archaeological research collection, an ethnographic research collection, or a biological teaching collection. This term can also include the assemblage’s ancillary data, such as archives and/or records.

Cultural Item: See [43 CFR 10.2 “Cultural items”](#)

Funerary object: See [43 CFR 10.2 “Funerary object”](#)

Object of Cultural Patrimony: See [43 CFR 10.2 “Object of cultural patrimony”](#)

Sacred object: See [43 CFR 10.2 “Sacred object”](#)

Holding or Collection: See [43 CFR 10.2 “Holding or collection”](#) (For example, an archaeological research collection, an ethnographic research collection, the “Joe Smith Collection,” etc.)

Human Remains: See [43 CFR 10.2 “Human remains”](#)

Image: Photographs, film, digital images, video tapes, and digital tapes.

Record: A paper or electronic document. Although interchangeable with the term archive (see “archive”), this term most often refers to administrative activities, policies, and more, rather than collection-specific documents. Alternatively, this also refers to a database-related term describing each entry specific object or subject within a database table.

C. The Process:

Consultation or Consult: See [43 CFR 10.2 “Consultation or consult”](#)

Cultural Affiliation: See [43 CFR 10.2 “Cultural affiliation”](#)

Custody: See [43 CFR 10.2 “Custody”](#)

Inventory: See [43 CFR 10.2 “Inventory”](#)

Native American traditional knowledge: See [43 CFR 10.2 “Native American traditional knowledge”](#)

Possession or Control: See [43 CFR 10.2 “Possession or control”](#)

Receives Federal Funds: See [43 CFR 10.2 “Receives Federal funds”](#)

Repatriation: See [43 CFR 10.2 “Repatriation”](#)

Right of Possession: See [43 CFR 10.2 “Right of possession”](#)

Summary: See [43 CFR 10.2 “Summary”](#)

Tribal Lands: See [43 CFR 10.2 “Tribal lands”](#)

Tribal Lands of an NHO: See [43 CFR 10.2 “Tribal lands of an NHO”](#)

IV. Reporting

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A. Communication/Correspondence

1. Report all communication in reference to NAGPRA compliance to the Campus NAGPRA Coordinator. This can be satisfied by including the Campus NAGPRA Coordinator (carbon copy, or “cc”) in communications or electronically archiving correspondence and submitting to the Campus NAGPRA Coordinator. Phone calls are acceptable, but must be followed up with, at minimum, the day, time, participants, and a summary of the call. The summary need not be detailed, but keep in mind that a lack of detail could hinder future conversations and decisions.
 - a. Written documents must be sent pertaining to ([43 CFR 10.1\(e\)](#)):
 - requests for repatriation
 - claims for disposition
 - Invitations to consult
 - Notices for publication
 - b. Written documents must be sent by one of the following methods ([43 CFR 10.1\(e\)\(1\)](#)):
 - email, with proof of receipt
 - personal delivery with proof of delivery date
 - private delivery service with proof of date sent, or
 - certified mail
 - c. Communication to the Manager, National NAGPRA Program, must be sent electronically to: nagpra_info@nps.gov ([43 CFR 10.1\(e\)\(2\)](#)).
2. Progress reports for current cases are submitted on a case-by-case basis (weekly, monthly, quarterly, or annually) between each Unit Representative and the Campus NAGPRA Coordinator.
3. The Tribal Relations Director will report the University’s annual NAGPRA compliance activities at the annual tribal consultation meeting (conducted under RPD 8-2, *Tribal Consultation*) ([SYS 645](#)).

B. University (Internal) Documents

1. Preliminary Inventory

When ancestral remains or cultural item(s) are identified, notify the Campus NAGPRA Coordinator as soon as possible (no later than 30 days of the discovery). These findings must be reported to the UW System NAGPRA Administrator within 90 days of the discovery, along with a strategic plan that complies with [43 CFR Part 10.9](#) and [43 CFR Part 10.10](#).

Subsequent steps are identified on a case-by-case basis, based on the context of each case. It is imperative that the Campus NAGPRA Coordinator be involved as early as possible, to ensure consistent compliance (for example, relationships may have already been established with potentially affiliated tribes, or the case may be associated with other current or past cases from this campus or an affiliated UW campus).

The initial report does not have to be detailed (as it is reasonable to assume that specifics, like total number of individuals or cultural items or descriptions of either, are not yet available).

2. Associated NAGPRA Documentation (See also Consultation Documentation)

All documentation acquired throughout the NAGPRA process must follow the NAGPRA Documents Records Schedule (TBA). Until this schedule is finalized, any document that is deemed appropriate for long-term archival storage must be submitted to the Campus NAGPRA Coordinator

no later than three (3) months after completing repatriation activities. All temporary documentation (draft copies, informal notes, and other documents identified under the direction of the Campus NAGPRA Coordinator) must be confidentially destroyed within one (1) year of completion of repatriation activities.

See [SYS 645](#) for documentation and reporting deadlines at the UW System level.

C. Official Documents Submitted to National NAGPRA Program

Any Unit Representative may report an itemized list, inventory or summary (or an update to an existing version of each) of ancestral remains and/or cultural items to the National NAGPRA Program, even if submitted by a different person or unit in the past. Drafting of each document, however, must be performed under the guidance of the Campus NAGPRA Coordinator.

D. Offers of Donation/New Acquisitions

While acceptance of Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony is not preferred as a general practice, there are options available to help facilitate repatriation in service to Wisconsin residents. If an offer of acquisition (purchase, donation, or other means) is extended to any unit on campus:

1. The Campus NAGPRA Coordinator may serve as a liaison to help facilitate disposition between the donor and one or more tribe. In this circumstance, ancestors and cultural items shall not be physically stored on UW property without proper documentation from both the entity in control and all interested tribal parties.
2. The UW may accept a donation or transfer offer with the intent to complete repatriation as soon as possible. This circumstance is considered rare and can only be implemented after a written request is received from Appropriate officials.

E. Deadlines*

Federal Collections: Deadlines	
Deadline	Action
1/13/2025	Each museum that has custody of a Federal agency holding or collection that may contain Native American human remains or cultural items must submit a statement describing that holding or collection to the authorized representatives of the Federal agency most likely to have possession or control and to the Manager, National NAGPRA Program. (43 CFR 10.8(c))
180 days	No later than 180 days following receipt of a museum's statement, the Federal agency must respond to the museum and the Manager, National NAGPRA Program, with a written acknowledgement of one of the following: (i) The Federal agency has possession or control of the holding or collection; (ii) The Federal agency does not have possession or control of the holding or collection; or (iii) The Federal agency and the museum agree that they have joint possession or control of the holding or collection (43 CFR 10.8(c)(1)) Failure to issue such a determination by the deadline constitutes acknowledgement that the Federal agency has possession or control. The Federal agency is responsible for the requirements of this subpart for any holdings or collections under its possession or control, regardless of the physical location of the holdings or collection. (43 CFR 10.8(c)(2))
Holdings or Collections in Custody: Deadlines	
Deadline	Action
1/13/2025	Each museum that has custody of a holding or collection that may contain Native American human remains or cultural items and for which it cannot identify any person, institution, State or local government agency, or Federal agency with possession or control of the holding or collection, must submit a statement describing that holding or collection to the Manager, National NAGPRA Program. (43 CFR 10.8(d))

Civil Penalties	
Deadline	Action
90 days after receipt	Assistant Secretary must determine if allegations meet the requirements of paragraph (a) . (43 CFR 10.11(b)) If yes, appropriate penalty is determined and notice of failure to comply is sent.
45 days after receipt	Museum must respond to a notice of failure to comply (43 CFR 10.11(e)) or notice of assessment (43 CFR 10.11(h))

* Days mean calendar days. If a deadline falls on a Saturday, Sunday, or Federal holiday, the action is deemed timely if taken no later than the next calendar day that is not a Saturday, Sunday, or Federal holiday. For purposes of this part, Federal holidays include any days during which the Federal government is closed because of a Federal holiday, lapse in appropriations, or other reasons ([43 CFR 10.1\(f\)\(1\)](#))

V. Consultation

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Step 1: Itemized List (Inventories and Summaries)

Compile an itemized list of any human remains and associated funerary objects OR a summary of a holding or collection.

Inventories: Ensure the itemized list is comprehensive and covers all relevant holdings or collections. OR

Summaries: Describe any holding or collection that may contain unassociated funerary objects, sacred objects, or objects of cultural patrimony and ensure the summary is comprehensive and covers all relevant holdings or collections.

This step may proceed without official consultation (but may include communication with Approved officials). See UW [Campus NAGPRA Procedures: Inventories](#) or UW [Campus NAGPRA Procedures: Summaries](#) regarding this step.

Step 2: Initiate consultation (Inventories and Summaries)

As soon as possible (Inventories) OR no later than 30 days (Summaries) after step 1, identify consulting parties based on information available and invite the parties to consult.

Step 2.1: Identify Consulting Parties ([43 CFR 10.10\(b\)](#))

As soon as possible after compiling an itemized list or summary, the Campus NAGPRA Coordinator, with assistance from the Unit Representative, will identify one or more consulting parties (i.e., any lineal descendant and any Indian Tribe or Native Hawaiian organization with potential cultural affiliation), based on information available.

Once every year, the Unit Representative, with assistance from the Campus NAGPRA Coordinator, will reassess unresolved claims and current Summaries. All newly-identified federally recognized tribes who may have an interest in human remains and cultural items currently present at the University will be identified as new consulting parties and must be invited to consult.

Resource: Refer to: <https://www.federalregister.gov/index/2024/indian-affairs-bureau> (Scroll down to “Indian Entities Recognized by and Eligible to Receive Services”) for the most current list; these are updated regularly.

Step 2.2: Distribute Invitations to Consult

As soon as possible after identifying a consulting party, draft and distribute an invitation to each to consult ([43 CFR 10.10\(b\)](#)).

Each invitation must be in writing and must include ([43 CFR 10.10\(b\)\(2\)](#)):

- An itemized list of ancestral remains, funerary objects, and/or cultural items
- The names of all consulting parties
- A proposed timeline and method for consultation

- If a new consulting party is identified, an invitation to consult must be sent: ([43 CFR 10.10\(b\)\(3\)](#)):
- no later than 30 days after identifying the new party OR
 - no later than two years after the addition of a Tribal entity to the list of federally recognized Indian Tribes published in the Federal Register:

Step 2.3: Respond to Requests for Additional Information

After consultation has been initiated, a more detailed inventory must be submitted to consulting tribes and the National NAGPRA Program ([43 CFR 10.10\(d\)](#)).

The following comprehensive information is recommended (if applicable information is available). See the National NAGPRA Program [templates](#) for updated versions:

Item [short description/title]:

Accession #:

Collection ID:

Catalog #:

Description:

Site Name/Site Number:

Geographical Location:

State:

County:

Acquisition History:

Number of individuals [can list individually or as a group/lot]:

Description:

Accession #:

Catalog #:

Number of associated funerary objects [can list individually or as a group/lot]:

Description:

Accession #:

Catalog #:

Age/Culture/Cultural affiliation:

Additional information or hazardous substances:

Comments:

In addition to the above recommended information, each unit will also compile and provide other information relating to NAGPRA-eligible collections as requested, including the Campus NAGPRA Coordinator in all communication. If this information will take significant time to compile ([SYS 645](#)):

- The unit will provide an estimated time frame for completion to the Appropriate official and the Campus NAGPRA Coordinator.
- The unit will include the Campus NAGPRA Coordinator on all responsive activities.

Step 3: Consult (Inventories and Summaries)

Consult on human remains or associated funerary objects OR cultural items

Respond to any consulting party, consult on identifications, and prepare a record of consultation that describes the concurrence, disagreement, or nonresponse of the consulting parties to the identifications.

Step 3.1: Requests for Consultation

A request for consultation originates from an Appropriate official and can be verbal or written in nature (in-person, virtual, phone, email, or mail), but must be submitted to the Campus NAGPRA Coordinator.

Provide clear instructions and contact information for submitting a request for consultation on the UW NAGPRA website (<https://nagpra.wisc.edu/contact-us/>), including web-based Request Information and Consultation Request forms ([SYS 645](#)).

The Campus NAGPRA Coordinator will manage a comprehensive list of consultation requests and will make this list available to the UW System NAGPRA Administrator. This list will include:

- Date of request
- Name and title of Appropriate official
- A brief description of the request, including:
 - a preference on the proposed timeline and method for consultation ([43 CFR 10.9\(c\)\(1\)\(i\)](#), [43 CFR Part 10.10\(c\)\(1\)](#))
 - the name, phone number, email address, or mailing address for any authorized representative, traditional religious leader, and known lineal descendant who may participate in consultation ([43 CFR 10.9\(c\)\(1\)\(ii\)](#), [43 CFR Part 10.10\(c\)\(1\)](#))
- A brief description and date(s) of the resulting action(s)

Step 3.2: Consultation Sessions

Step 3.2.1: Scheduling Consultation Sessions

Consultation sessions are scheduled by the Campus NAGPRA Coordinator, with assistance from the applicable Unit Representative(s) relevant to the case in question. Each consultation session is scheduled in the format (in-person, virtual, phone) requested by the Appropriate official ([SYS 645](#)).

The Campus NAGPRA Coordinator will offer reimbursement for travel (including local lodging) and honoraria (for expertise provided by tribal representatives and religious leaders) through grants or internal funds (UW NAGPRA annual budget, managed by the Campus NAGPRA Coordinator).

The Campus NAGPRA Coordinator will facilitate collaboration between units at the University and between Universities of Wisconsin campuses to consolidate consultation sessions when appropriate or relevant ([SYS 645](#)).

All consultation session schedules must be reported, in advance of the session, by the Campus NAGPRA Coordinator to the UW System NAGPRA Administrator.

The Campus NAGPRA Coordinator will manage a comprehensive list of consultation sessions and will make this list available to the UW System NAGPRA Administrator ([SYS 645](#)). This list will include:

- Date of session
- Location or format of session (in-person, virtual, phone, email, mail, etc.)
- Names and titles of all participants
- A brief description of the session topic
- A brief description of the concurrence, disagreement, or nonresponse of the consulting parties, addressing the minimum consultation topics listed above ([43 CFR 10.10\(c\)\(3\)](#)).

Step 3.2.2: Compiling Documents for Consultation Sessions

Each unit will compile and provide relevant information for each consultation session as requested by the Appropriate official(s) ([43 CFR 10.10\(c\)\(4\)](#)), following the [Inventories](#) and [Summaries](#) procedures.

Although not required under NAGPRA, units are encouraged to consult with Tribal nations regarding identification of other items under the institution's control that might be culturally sensitive ([SYS 645](#)).

- a. Consultation Session Agendas/Notes
The consultation session proctor (either the Campus NAGPRA Coordinator or the UW System NAGPRA Administrator) will provide paper copies of the agenda and discussion supplements (Inventory or Summary, additional descriptive or analysis data, publications, requested information, etc.) at each consultation session. Electronic copies of these documents will be distributed in advance only after approval from the Appropriate officials who will be present.
- b. Consultation Session Supporting Documents
 - i. Itemized Inventory
 - ii. Supplemental Data/Resources

Step 3.2.3: Consultation Session Written Agreements

A written agreement must be approved and signed between the University and the Tribal nation prior to each consultation session (one agreement may serve for multiple consultation sessions but must be reviewed and approved prior to each future consultation session), unless the Tribal nation does not want one.

The following should be included, at minimum, in each written agreement:

- Specific collections and/or cultural items of concern, and subjects or types of information that should be considered confidential ([SYS 645](#)).
- A clear description of traditional care, storage requirements (including rehousing, if requested), handling, and access for the Native American ancestral remains and cultural items from this point forward (see also [Duty of Care](#) above) ([SYS 645](#)).
- Recording restrictions before, during, and after the consultation session, including both note taking and the use of recording devices (like cameras) ([SYS 645](#)).
- A clear statement of the tribe's requests regarding the access to information that the university may provide to tribal members, researchers, staff, government officials, the press, and members of the public who submit a request for information ([SYS 645](#)).

Step 3.2.4: Hosting Consultation Sessions

The consultation session must be proctored by either the Campus NAGPRA Coordinator or the Universities of Wisconsin NAGPRA Administrator ([SYS 645](#)), utilizing the Campus NAGPRA Committee if applicable (once established).

The Campus NAGPRA Coordinator will strive to resolve disagreements in good faith through mutually agreed upon processes of mediation or arbitration at consultation sessions. Disagreements deemed unresolved upon conclusion of the session may be addressed at one or more future consultation sessions. If no consensus can be determined by the legal deadlines, the

Chancellor or his or her designee will make a determination based on the available evidence that reflects the University's legal obligations and ethical position.

Step 3.2.4.1: Consultation Session Agenda: Inventories

Each consultation session pertaining to Inventories must address, at minimum ([43 CFR 10.10\(c\)\(2\)](#)):

- Lineal descendants
- Indian Tribes or Native Hawaiian organizations with cultural affiliation
- The types of objects that might be associated funerary objects, including any objects that were made exclusively for burial purposes or to contain human remains; and
- The duty of care under [§ 10.1\(d\)](#) for human remains or associated funerary objects

Step 3.2.4.2: Consultation Session Agenda: Summaries

Each consultation session pertaining to Summaries must address, at minimum ([43 CFR 10.9\(c\)\(2\)](#)):

- Lineal descendants
- Indian Tribes or Native Hawaiian organizations with cultural affiliation
- The types of objects that might be unassociated funerary objects, sacred objects, or objects of cultural patrimony; and
- The duty of care under [§ 10.1\(d\)](#) for unassociated funerary objects, sacred objects, or objects of cultural patrimony.

Step 3.2.4.3: Consultation Session Agenda: Cultural Affiliation (Inventories and Summaries)

Consultation will include a discussion to determine cultural affiliation ([43 CFR 10.3\(a\)](#)):

- One or more of the following equally relevant types of information about ancestral remains or cultural items may be used: Anthropological, archaeological, biological, folkloric, geographical, historical, kinship, linguistic, oral traditional, or other relevant information or expert opinion, including Native American traditional knowledge.
- A lack of any type of information does not preclude a determination of cultural affiliation. One type of information may be used to determine cultural affiliation when no other relevant information is available.

Three criteria must be identified for cultural affiliation ([43 CFR 10.3\(b\)](#)):

- (i) One or more earlier groups connected to the human remains or cultural items
- (ii) One or more Indian Tribes or Native Hawaiian organizations; and
- (iii) A relationship of shared group identity between the earlier group and the Indian Tribe or Native Hawaiian organization that can be reasonably traced through time.

As little as one line of information may be used to identify the criteria ([43 CFR 10.3\(b\)\(2\)](#)).

The final cultural affiliation determination (which can be to more than one tribe) must meet one of the following ([43 CFR 10.3\(c\)\(1\)](#)):

- (i) Cultural affiliation is identified clearly by the information available,
- (ii) Cultural affiliation is identified reasonably by the geographical location or acquisition history, or
- (iii) Cultural affiliation cannot be clearly or reasonably identified.

Step 4 (Inventories): Complete an inventory

Complete an inventory of human remains or associated funerary objects

By deadlines described below, submit an inventory with clear determinations to all consulting parties and nagpra_info@nps.gov.

This step may proceed without official consultation (but may include communication with Appropriate officials). See Inventories and Summaries in the UW Campus NAGPRA Procedures regarding this step.

Step 5 (Inventories): Submit a notice of inventory completion

No later than six months after step 4, submit a notice to consulting parties and to nagpra_info@nps.gov for publication in the Federal Register.

This step may proceed without official consultation (but may include communication with Appropriate officials). See Inventories and Summaries in the UW Campus NAGPRA Procedures regarding this step.

Step 6 (Inventories)/Step 4 (Summaries): Receive and consider requests for repatriation

At any time after publication of a notice or compiling a summary, any lineal descendant, Indian Tribe or Native Hawaiian organization may submit a request for repatriation of a request for repatriation of cultural items.

This step may proceed without official consultation (but may include communication with Appropriate officials). See Inventories and Summaries in the UW Campus NAGPRA Procedures regarding this step.

Step 7 (Inventories)/Step 5 (Summaries): Respond to a request for repatriation

No later than 90 days after step 6 (Inventories) or Step 4 (Summaries), send a written response to the requestor and any other party identified in the notice (Inventories) or consulting party (Summaries).

This step may proceed without official consultation (but may include communication with Appropriate officials). See Inventories and Summaries in the UW Campus NAGPRA Procedures regarding this step.

Step 6 (Summaries): Submit a notice of intended repatriation

No later than 30 days after step 5, submit a notice of intended repatriation to all requestors, any consulting parties, and to nagpra_info@nps.gov for publication in the Federal Register.

This step may proceed without official consultation (but may include communication with Appropriate officials). See Inventories and Summaries in the UW Campus NAGPRA Procedures regarding this step.

Step 8 (Inventories): Repatriation of the human remains or associated funerary objects /

Step 7 (Summaries): Repatriation of cultural items.

No later than 90 days after step 7 (Inventories) or after publication of a notice (Summaries), send a written repatriation statement to the requestor and a copy to nagpra_info@nps.gov.

This step may proceed without official consultation (but may include communication with Appropriate officials). See Inventories and Summaries in the UW Campus NAGPRA Procedures regarding this step.

VI. Duty of Care ([43 CFR 10.1\(d\)](#))

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NOTE: This procedure is reserved as it is being written.

The University of Wisconsin-Madison supports traditional care, approved storage methods, and restricted building access policies relating to cultural items (both identified and potentially NAGPRA-eligible).

A. Current Duty of Care Provisions

The care of ancestral remains and culturally sensitive materials must adhere to the current preferences of Appropriate officials. This means the specific requirements may be adapted as a result of future consultation sessions. The topic of Duty of Care must be included in each consultation discussion, per the campus [Consultation](#) procedures.

The requirements listed below have been approved through past consultations and should be reviewed during each consultation session or through formal communication with one or more Appropriate officials:

Category	Requirement	Approved By (Date)*
Security/Access		
	The room must have restricted and monitored access.	Standard museum best practice
Environment		
	The room must be climate-controlled.	Standard museum best practice
Storage		
	Original storage containers must not be replaced, unless such a container poses a potential threat to either its contents (i.e., unstable/deteriorating) or the rest of the collection (i.e., potential pest infestation or chemical contaminate). In such cases, adequate effort must be made to either photo-document or save portions of the original container that include information about its contents prior to transfer to a new container. Whenever possible, wait to update storage conditions until after tribal consent has been obtained.	Standard museum best practice
Handling		
	Ancestral remains and culturally sensitive materials will not be directly handled unless as part of the initial inventory process to gather sufficient data to proceed with reporting and consultation.	Group consultations (WI tribes), 2008-present
	If the subject of a current repatriation request, or if included in an active repatriation case, handling restrictions will proceed under the guidance of Appropriate officials, as long as requests do not conflict with campus policy or the safety of university personnel.	Group consultations (WI tribes), 2008-present
Imaging/Documentation		
	Recording: Imaging (i.e., photography, scan, 3-D scan, etc.) and documentation of ancestral remains and cultural items is only performed after tribal consultation and clear guidance has been received, including imaging and detailed documentation for the purpose of inventory in pursuit of NAGPRA compliance.	Group consultations (WI tribes), 2008-present
Exhibit Interpretation		
	The University recognizes the obligation to interpret and exhibit cultural items with accuracy, sensitivity, and respect for their relationship to the culture of Indigenous peoples. Dialogue between the Appropriate official and an appropriate representative from the UW will occur as needs arise to attempt to represent fairly and objectively the beliefs and viewpoints of Native nations, especially where ceremonial and religious objects are concerned. The need for meaningful dialogue is especially critical when culturally sensitive materials (both identified and potential cultural items) are proposed for exhibit.	Standard museum best practice

*The referenced date reflects the latest known communication with the listed Appropriate official(s), although the requirement may have been in effect prior to this date.

B. Procedures for Ceremonial Activities in Campus Buildings

University of Wisconsin-Madison Environmental Health & Safety (EH&S) Fire Safety Agreement for Ceremonial Burning Activities in Campus Buildings

Environmental Health & Safety/Fire Protection (EH&S) supports requests from campus units to allow Native American community members to hold ceremonial activities that will involve the burning of tobacco, sage, sweet grass (smudging) within any campus building, as long as the unit agrees to the following stipulations:

1. Smudging ceremonies will only be approved through consultation following Universities of Wisconsin System Regent Policy Document 8-2, "Tribal Consultation."
2. All smudging ceremonies will take place within a pre-approved space in the building.
3. The UW Electric Shop* and EH&S will be notified via email at least 48 hours prior to any ceremony involving burning of any tobacco, sage or sweet grass. This notification will prompt a campus-wide notification protocol already in place to announce the day, time, and reason for the system interruption. After the ceremony, another email will be sent to the same group to announce completion and that the system is back online.

*Note that a work order may be needed to complete scheduling with the UW Electrical Shop.

The following people/positions should be notified to coordinate risk management and security/safety in advance of the ceremony:

Campus NAGPRA Coordinator
Environmental Health Manager (Fire & Life Safety)
Building Manager
Central Campus Community Officer, UWPD
Regional Facility Coordinator

4. The UW Electric Shop will disable the building's fire detection system for a period of not more than 30 minutes. Exact timing will be determined during planning between the Campus NAGPRA Coordinator and UW Electrical Shop.
5. The UW Electric Shop and the Campus NAGPRA Coordinator will have the means to be in constant communication with each other once the fire alarm system has been disabled.
6. If HVAC duct detectors detect smoke during the smudging ceremony (supervisory signal), further smudging ceremonies should be put on hold until EH&S and the A/E group can work out how to disable the HVAC system in the appropriate building space(s).
7. Immediately prior to the start of the ceremony:
 - All combustible materials (boxes, paper, cardboard, etc.) will be cleared of the immediate area.
 - Fire extinguishers will be located.
 - Fire alarm pull stations will be located.

Contacts:

Campus NAGPRA Coordinator: Elizabeth Leith (ealeith@wisc.edu; 608-890-1823 (office))

Environmental Health Manager (Fire & Life Safety): Jeff Schiller (jeff.schiller@wisc.edu; 608-225-7693 (office))

Building Managers (refer to building(s) affected by the requested ceremony)

Sewell Social Science Building Manager: Tammy Herbst-Koel (tammy.herbst-koel@wisc.edu; 608-890-4745 (office)) and Dana Rockett (dana.rockett@wisc.edu; 608-262-3199 (office))

Central Campus Community Officer, UWPD: Erik Pearce (erik.pearce@wisc.edu; 608-262-0846 (office))

Regional Facility Coordinator: Dustin Ludke (dkudke@wisc.edu; 608-265-8301 (office))

UW Electric Shop: TBA

VII. Inventories

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Following [guidance from the National NAGPRA Program](#), the following steps are used for ancestral remains and associated funerary objects:

Step 1: Itemized List

Compile an itemized list of any human remains and associated funerary objects.

Ensure the itemized list is comprehensive and covers all relevant holdings or collections.

Step 1.1: Itemized List Templates

Reporting templates can be downloaded from the National NAGPRA Program website:

<https://www.nps.gov/subjects/nagpra/templates.htm>

At minimum, the following information must be included (if available):

- i) Number of individuals *identified in a reasonable manner*.
- ii) Number of associated funerary objects and types of objects (counted separately or by lot)
- iii) Geographical location (provenience) by county or state
- iv) Acquisition history (provenance)
- v) Other information available, including age, culture, or cultural affiliation
- vi) Presence of any potentially hazardous substances

The following additional information is recommended (if applicable information is available):

Item [short description/title]:

Accession #:

Collection ID:

Catalog #:

Description:

Site Name/Site Number:

Geographical Location:

State:

County:

Acquisition History:

Number of individuals [can list individually or as a group/lot]:

Description:

Accession #:

Catalog #:

Number of associated funerary objects [can list individually or as a group/lot]:

Description:

Accession #:

Catalog #:

Age/Culture/Cultural affiliation:

Additional information or hazardous substances:

Comments:

Step 2: Initiate consultation

As soon as possible after step 1, identify consulting parties based on information available and invite the parties to consult.

See [Consultation](#) in the UW Campus NAGPRA Procedures.

Step 3: Consult on human remains or associated funerary objects.

Respond to any consulting party, consult on identifications, and prepare a record of consultation that describes the concurrence, disagreement, or nonresponse of the consulting parties to the identifications.

See [Consultation](#) in the UW Campus NAGPRA Procedures.

Step 4: Complete an inventory of human remains or associated funerary objects.

By deadlines described below, submit an inventory with clear determinations to all consulting parties and nagpra_info@nps.gov.

Inventories are required for submission to the National NAGPRA Program for publication in the Federal Register, per NAGPRA regulations. They follow a specific template format and must include adequate consultation that follows regulation requirements. The Campus NAGPRA Coordinator will assist with this process, but the Unit Representative will provide necessary data.

a. Reporting templates can be downloaded from the National NAGPRA Program website:

<https://www.nps.gov/subjects/nagpra/templates.htm>

b. At minimum, the following information must be included ([43 CFR 10.10\(d\)\(1\)](#)):

- The names of all consulting parties and dates of consultation
- The information, updated as appropriate, from the itemized list (see Itemized List above)
- For each entry in the itemized list, a determination identifying one of the following:
 - A known lineal descendant (whose name may be withheld)
 - The Indian Tribe or Native Hawaiian organization with cultural affiliation that is clearly identified by the information available about the human remains or associated funerary objects
 - The Indian Tribe or Native Hawaiian organization with cultural affiliation that is reasonably identified by the geographical location or acquisition history of the human remains or associated funerary objects; or
 - No lineal descendant or any Indian Tribe or Native Hawaiian organization with cultural affiliation can be clearly or reasonably identified. The inventory must briefly describe the information considered under [§ 10.3\(a\) of this part](#) and the criteria identified under [§ 10.3\(b\) of this part](#) to explain how the determination was made.

Step 5: Submit a notice of inventory completion.

No later than six months after step 4, submit a notice to consulting parties and to nagpra_info@nps.gov for publication in the Federal Register.

Step 6: Receive and consider requests for repatriation.

At any time after publication of a notice, any lineal descendant, Indian Tribe or Native Hawaiian organization may submit a request for repatriation.

Step 6.1: Disposition Claims/Requests: Inventories

A claim for disposition may be submitted by any single Tribal nation or jointly up to all Tribal nations listed as culturally affiliated (in the case of multiple affiliations, not all Tribal nations listed are required to submit a joint claim).

If competing claims are received, follow the procedure outlined in [43 CFR 10.3\(e\)](#)

Step 7: Respond to a request for repatriation.

No later than 90 days after step 6, send a written response to the requestor and any other party identified in the notice.

Step 7.1: Repatriation Request Responses: Inventories

When a request for repatriation is received by an Appropriate official:

1. Confirm the Tribal nation is listed on the Notice of Inventory Completion. If not, proceed with consultation (Step 3) and potentially a Notice of Inventory Completion Amendment – Cultural Affiliation.

2. Submit acknowledgement of receipt of the request to the Appropriate official.
3. Upon completion of 30 days after the Notice was published in the Federal Register, compile all repatriation request responses:
4. Proceed with repatriation.

Step 8: Repatriation of the human remains or associated funerary objects.

No later than 90 days after step 7, send a written repatriation statement to the requestor and a copy to nagpra_info@nps.gov.

Deadlines: Inventories

After January 12, 2024, museums or Federal agencies must complete steps 1 through 4 by the following deadlines ([43 CFR 10.10\(d\)\(2\)](#)):

If a museum or Federal agency...	An inventory must be submitted...
Acquires possession or control of human remains or associated funerary objects (including transfer of a holding or collection previously included in an inventory)	2 years after acquisition*
Locates previously lost or unknown human remains or associated funerary objects	2 years after locating
Receives Federal funds for the first time	5 years after receiving
Has human remains or associated funerary objects that were not published in a notice of inventory completion by 1/12/2024	January 10, 2029

*Existing published Notices may be used to target specific tribes for consultation ([43 CFR 10.10\(d\)\(4\)](#)).

Inventories: Deadlines	
Deadline	Action
2 years after acquisition	Submit an inventory (acquiring possession or control of human remains and associated funerary objects) (43 CFR 10.10(d)(2))
2 years after locating	Submit an inventory (locating human remains and associated funerary objects) (43 CFR 10.10(d)(2))
30 days after identifying a new consulting party	invite new party/parties to consult, based on new information. (43 CFR 10.10(b)(3)(i))
2 years after federal recognition	invite new party/parties to consult, based on addition of federal recognition. (43 CFR 10.10(b)(3)(ii))
1/10/2029	(For inventories currently reported to National NAGPRA Program): Initiate consultation Consult Update Inventory (itemized list) Submit updated inventory to all consulting parties and National NAGPRA Program (43 CFR 10.10(d)(3))
30 days after acquisition	Send previously compiled inventory for human remains and associated funerary objects transferred to the museum. Summary submission then follows the above timeline. (43 CFR 10.10(d)(4))
Deadline Extension Request	Museums may submit a request if good-faith effort is shown (43 CFR 10.10(d)(5))
6 months after updating or completing inventory	Submit Notice of Inventory Completion (43 CFR 10.10(e))
21 days after receipt	National NAGPRA Program Manager must respond to submitted Notice (either publish or reply with requested revisions) (43 CFR 10.10(e)(3))
14 days after receipt	Resubmit revised Notice of Inventory Completion to National NAGPRA Program (43 CFR 10.10(e)(3))
30 days after publication	Respond to request for repatriation (Inventory) (43 CFR 10.10(g))
<= 90 days after responding to request for repatriation	Repatriate human remains and associated funerary objects listed in Federal Register publication and submit repatriation statement to National NAGPRA Program (43 CFR 10.10(h))
See Regulations	Competing Claims (43 CFR 10.10(i))
See Regulations	Stay of Repatriation (43 CFR 10.10(j))
See Regulations	Transfer or reinter human remains and associated funerary objects with no lineal descendant or no Indian Tribe or Native Hawaiian organization with cultural affiliation. (43 CFR 10.10(k))

Civil Penalties	
Deadline*	Action
90 days after receipt	Assistant Secretary must determine if allegations meet the requirements of paragraph (a) . (43 CFR 10.11(b)) If yes, appropriate penalty is determined and notice of failure to comply is sent.
45 days after receipt	Museum must respond to a notice of failure to comply (43 CFR 10.11(e)) or notice of assessment (43 CFR 10.11(h))

* Days mean calendar days. If a deadline falls on a Saturday, Sunday, or Federal holiday, the action is deemed timely if taken no later than the next calendar day that is not a Saturday, Sunday, or Federal holiday. For purposes of this part, Federal holidays include any days during which the Federal government is closed because of a Federal holiday, lapse in appropriations, or other reasons ([43 CFR 10.1\(f\)\(1\)](#))

Extension Request:

Any museum may request an extension if it has made a good faith effort but is unable to meet the deadline. Federal agencies are not eligible to request an extension and must meet the deadlines above. A museum request for an extension must be submitted BEFORE the deadline and must include:

1. Information showing the initiation of consultation;
2. Names of all consulting parties and consent to the extension from a majority of consulting parties;
3. Estimated number of human remains and associated funerary objects; and
4. Written plan for completing or updating the inventory.

VIII. Summaries

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Following [guidance from the National NAGPRA Program](#), the following steps are used for cultural items (unassociated funerary objects, sacred objects, and objects of cultural patrimony). These steps may also be used for other culturally sensitive materials in a good faith effort to abide by the spirit of NAGPRA and its Duty of Care clause.

Step 1: Compile a summary of a holding or collection.

Describe any holding or collection that may contain unassociated funerary objects, sacred objects, or objects of cultural patrimony and ensure the summary is comprehensive and covers all relevant holdings or collections.

Summaries are required for submission to the National NAGPRA Program’s files, per NAGPRA regulations. They follow a specific template format and must include notice to all potentially affiliated tribes. The Campus NAGPRA Coordinator will assist with this process, but the Unit Representative will provide information needed to include in the template.

Depending on the scope of the holding or collection, a museum or Federal agency may organize its summary into sections based on geographical area, accession or catalog name or number, or other defining attributes. A museum or Federal agency must ensure the summary is comprehensive and covers any holding or collection relevant to this section. ([43 CFR 10.9\(a\)](#))

- a. Reporting templates can be downloaded from the National NAGPRA Program website: <https://www.nps.gov/subjects/nagpra/templates.htm>
- b. At minimum, the following information must be included:
 - (i) The estimated number and a general description of the holding or collection, including any potential cultural items;
 - (ii) The geographical location (provenience) by county or State where the potential cultural items;
 - (iii) The acquisition history (provenance) of the potential cultural items;
 - (iv) Other information relevant for identifying:
 - (A) A lineal descendant or an Indian Tribe or Native Hawaiian organization with cultural affiliation, and
 - (B) Any object as an unassociated funerary object, sacred object, or object of cultural patrimony; and

- (v) The presence of any potentially hazardous substances used to treat any of the unassociated funerary objects, sacred objects, or objects of cultural patrimony, if known. ([43 CFR 10.9\(a\)\(1\)](#))

Step 2: Initiate consultation.

No later than 30 days after step 1, identify consulting parties based on information available and invite the parties to consult. See [Consultation](#) in the UW Campus NAGPRA Procedures.

Step 3: Consult on cultural items.

Respond to any consulting party, consult on identifications, and prepare a record of consultation that describes the concurrence, disagreement, or nonresponse of the consulting parties to the identifications. See [Consultation](#) in the UW Campus NAGPRA Procedures.

Step 4: Receive and consider requests for repatriation.

At any time after compiling a summary, any lineal descendant, Indian Tribe or Native Hawaiian organization may submit a request for repatriation of cultural items.

Step 4.1: Repatriation Requests: Summaries

Requests for repatriation in response to a Summary must meet the following criteria ([43 CFR 10.9\(d\)\(3\)](#)):

- (i) Each unassociated funerary object, sacred object, or object of cultural patrimony being requested meets the definition of an unassociated funerary object, a sacred object, or an object of cultural patrimony;
- (ii) The request is from a lineal descendant or an Indian Tribe or Native Hawaiian organization with cultural affiliation; and
- (iii) The request includes information to support a finding that the museum or Federal agency does not have right of possession to the unassociated funerary object, sacred object, or object of cultural patrimony.

Step 5: Respond to a request for repatriation.

No later than 90 days after step 4, send a written response to the requestor and any other consulting party.

Step 5.1: Repatriation Request Responses: Summaries (must be one of the following): ([43 CFR 10.9\(3\)](#))

- (i) The request meets the criteria under [paragraph \(d\)](#) of this section. The museum or Federal agency must submit a notice of intended repatriation under [paragraph \(f\)](#) of this section.
- (ii) The request does not meet the criteria under [paragraph \(d\)](#) of this section. The museum or Federal agency must provide a detailed explanation why the request does not meet the criteria and an opportunity for the requestor to provide additional information to meet the criteria.
- (iii) The request meets the criteria under [paragraph \(d\)\(3\)\(i\)](#) and [\(ii\)](#) of this section, but the museum or Federal agency asserts a right of possession to the unassociated funerary object, sacred object, or object of cultural patrimony and refuses repatriation of the requested object to the requestor. The museum or Federal agency must provide information to prove that the museum or Federal agency has a right of possession to the unassociated funerary object, sacred object, or object of cultural patrimony.
- (iv) The museum or Federal agency has received competing requests for repatriation of the unassociated funerary object, sacred object, or object of cultural patrimony that meet the criteria and must determine the most appropriate requestor using the procedures and deadlines under [paragraph \(h\)](#) of this section.

Step 6: Submit a notice of intended repatriation.

No later than 30 days after step 5, submit a notice of intended repatriation to all requestors, any consulting parties, and to nagpra_info@nps.gov for publication in the Federal Register.

Step 7: Repatriation of cultural items.

No later than 90 days after publication of a notice, send a written repatriation statement to the requestor and a copy to nagpra_info@nps.gov.

Deadlines: Summaries

After January 12, 2024, museums or Federal agencies must complete Step 1 by the following deadlines:

If a museum or Federal agency...	A summary must be submitted...
Acquires possession or control of unassociated funerary objects, sacred objects, or objects of cultural patrimony (including transfer of a holding or collection previously included in an inventory)	6 months after acquisition*
Locates previously lost or unknown unassociated funerary objects, sacred objects, or objects of cultural patrimony	6 months after locating
Receives Federal funds for the first time	3 years after receiving

*Existing submitted summaries may be used to target specific tribes for consultation ([43 CFR 10.9\(a\)\(3\)](#)).

Summaries: Deadlines	
Deadline	Action
6 months after acquisition	Submit a summary (acquiring possession or control of unassociated funerary objects, sacred objects, or objects of cultural patrimony) (43 CFR 10.9(a)(2))
6 months after locating	Submit a summary (locating unassociated funerary objects, sacred objects, or objects of cultural patrimony) (43 CFR 10.9(a)(2))
30 days after acquisition	Send previously compiled summary for cultural items transferred to the museum. Summary submission then follows the above timeline. (43 CFR 10.9(a)(3))
30 days after compiling a summary	Identify consulting parties based on information available and invite the parties to consult. (43 CFR 10.9(b))
30 days after identifying a new consulting party	invite new party/parties to consult, based on new information. (43 CFR 10.9(b)(3)(i))
6 months after federal recognition	invite new party/parties to consult, based on addition of federal recognition. (43 CFR 10.9(b)(3)(ii))
90 days after receipt	Respond to request for repatriation (Summary) (43 CFR 10.9(e))
30 days after response to request	Submit Notice of Intended Repatriation (43 CFR 10.9(f))
21 days after receipt	National NAGPRA Program Manager must respond to submitted Notice (either publish or reply with requested revisions) (43 CFR 10.9(f)(3))
30-90 days after publication	Repatriate cultural items listed in Federal Register publication and submit repatriation statement to National NAGPRA Program (43 CFR 10.9(g))
See Regulations	Competing Claims (43 CFR 10.9(h))
See Regulations	Stay of Repatriation (43 CFR 10.9(i))

Civil Penalties	
Deadline*	Action
90 days after receipt	Assistant Secretary must determine if allegations meet the requirements of paragraph (a) . (43 CFR 10.11(b)) If yes, appropriate penalty is determined and notice of failure to comply is sent.
45 days after receipt	Museum must respond to a notice of failure to comply (43 CFR 10.11(e)) or notice of assessment (43 CFR 10.11(h))

* Days mean calendar days. If a deadline falls on a Saturday, Sunday, or Federal holiday, the action is deemed timely if taken no later than the next calendar day that is not a Saturday, Sunday, or Federal holiday. For purposes of this part, Federal holidays include any days during which the Federal government is closed because of a Federal holiday, lapse in appropriations, or other reasons ([43 CFR 10.1\(f\)\(1\)](#))

IX. Documentation and Retention

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As a State of Wisconsin institution, the UWAC holds all of its objects, archives, records, and digital data in trust for the public. Like the objects themselves, digital data must conform to modern professional best practices.

Whenever possible, archiving practices for documentation relating to the NAGPRA process should conform to [Regent Policy Document 3-2, Public Records Management \(RPD 3-2\)](#), the [University of Wisconsin System Library, Archives and Museum General Records Schedule](#), or the University of Wisconsin System NAGPRA Records Schedule (*forthcoming*), whichever is most applicable.

[Note: NAGPRA-specific retention schedule is currently being initiated by the Retention Office. This should include a blanket restriction clause under sensitive information.]

A. Archives Storage

The Campus NAGPRA Coordinator will manage the following in a secure location with restricted access and backup protocols, and in compliance with the UW NAGPRA Retention Schedule:

- a list of all tribal communications and official consultation sessions performed in reference to NAGPRA activities on the UW-Madison campus,
- a list of all inventories, summaries, and publications submitted to the National NAGPRA Program from the UW-Madison campus (including copies of said documents), and
- all repatriation documents (including transfer of control and transfer of possession) of activities that has occurred on the UW-Madison campus

B. Images and Archives: Access

All units on campus must follow the Duty of Care agreements on file when accessing documents and images relating to a NAGPRA case, including for public and research inquiries that are received from tribal members, government officials, researchers, staff, public citizens, and the press.

If there is no Duty of Care agreement on file or the Duty of Care agreement does not address accessing documents and images, then the campus unit should consult with the Campus NAGPRA Coordinator prior to accessing the documents and images to determine whether they can be accessed.

All campus units must immediately notify the Campus NAGPRA Coordinator if they become aware of any public records requests that involve accessing documents and images relating to a NAGPRA case so that the Campus NAGPR Coordinator can consult with the Office of Compliance on the request.

X. Campus NAGPRA Committee

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NOTE: This section is held in RESERVE until a committee is established.

A. Purpose

This committee provides guidance on campus compliance when expertise beyond the boundaries of the Campus NAGPRA Coordinator is needed.

B. Committee Members

1. Executive/Permanent Members
TBD
2. Advisory/Temporary Members
TBD

X. Related References

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A. Related UW-Madison or UW System Policies/Documents

[RPD 3-2, Public Records Management](#)

[RPD 8-2, Tribal Consultation](#)

[SYS 645, Native American Graves Protection and Repatriation Act \(NAGPRA\) Compliance](#)

[UW-175, Native American Graves Protection and Repatriation Act \(NAGPRA\) Compliance \(forthcoming\)](#)

B. Related UW-Madison Documents

[University of Wisconsin System NAGPRA General Records Schedule \(forthcoming\)](#)

[University of Wisconsin System Library, Archives and Museum General Records Schedule](#)

C. Related External References

[Native American Graves Protection and Repatriation Act \(Public Law 101-601\)](#)

[Native American Graves Protection and Repatriation Act \(Regulations\)](#)

[Advisory Council on Historic Preservation. Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects.](#)

[Curation of Federally Owned or Administered Archeological Collections \(36 CFR Part 79\)](#)

[Wis. Stats. § 44.47, “Field archaeology”](#)

[Wis. Stats. § 44.48, “Archaeological resources”](#)

[Wis. Stats. § 157.70, “Burial sites preservation”](#)