

# **Summit Report**

# Cultivating a NAGPRA Community of Practice

March 25-26, 2019

# University of Denver Museum of Anthropology Denver, Colorado

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This project is made possible in part by the Institute of Museum and Library Services (MG-70-18-0050-18). Please contact Principal Investigator Anne Amati, MA, if you have any questions or would like additional information at anne.amati@du.edu.



# **Summit Participants**

Dominique Alhambra, Denver Museum of Nature & Science, Denver CO

Tim Baumann, McClung Museum, University of Tennessee, Knoxville TN

Christina Cain, University of Colorado Museum of Natural History, Boulder CO

Patricia Capone, Peabody Museum, Harvard University, Cambridge MA

Jodi DeBruyne, Abbe Museum, Bar Harbor ME

Suzanne Eckert, Arizona State Museum, University of Arizona, Tucson AZ

Lucy Fowler Williams, Penn Museum, University of Pennsylvania, Philadelphia PA

Eugene Futato, Office of Archaeological Research, University of Alabama, Tuscaloosa AL

Sheila Goff, History Colorado (retired), Denver CO

Rae Gould, Department of Anthropology, University of Massachusetts Amherst, Amherst MA

Kelly Hyberger, San Diego Museum of Man, San Diego CA

Elise LeCompte, Florida Museum of Natural History, University of Florida, Gainesville FL

Bradley Lepper, Ohio History Connection, Columbus OH

Marc Levine, Sam Noble Museum, University of Oklahoma, Norman OK

Ellen Lofaro, Department of Anthropology, University of Tennessee, Knoxville TN

Nell Murphy, American Museum of Natural History, New York NY

Angela Neller, Wanapum Heritage Center, Mattawa WA

Dawn Rewolinski, Gilcrease Museum, Tulsa OK

Helen Robbins, Field Museum, Chicago IL

Amanda Roberts Thompson, Center for Archaeological Sciences, University of Georgia, Athens GA

Donna Ruhl, Florida Museum of Natural History, University of Florida, Gainesville FL

Scott Shirar, University of Alaska Museum of the North, Fairbanks AK

Jayne-Leigh Thomas, Office of NAGPRA, Indiana University, Bloomington IN

Rebecca West, Plains Indian Museum at the Buffalo Bill Center of the West, Cody WY

### **Summit Team**

Facilitator and Project Director: Anne Amati, *University of Denver Museum of Anthropology* Evaluator: Laureen Trainer, *Trainer Evaluations* 

Research Assistants: Lydia Degn-Sutton, Ellyn DeMuynck, Nick Dungey, Manuel Ferreira, Laura Hughes, Melissa Kocelko, Lydia Wood, and Leah Zavaleta, *University of Denver* Anthropology graduate students. Julie Byle, Ashley Muggli, and Jane Richardson, University of Colorado Museum and Field Studies graduate students

Summit Coordinator: Jamie Dinneen, *University of Denver Department of Anthropology* Museum Director: Christina Kreps, *University of Denver Museum of Anthropology* 



## **Definitions**

The Native American Graves Protection and Repatriation Act (NAGPRA) provides a process for descendants and tribes to request the return of human remains and certain cultural items under the control of federal agencies and institutions that receive federal funding; includes provisions for discoveries of Native American cultural items on federal and tribal lands after November 16, 1990; establishes penalties for non-compliance and illegal trafficking; and sets up a review committee to monitor the process and facilitate the resolution of disputes.

A **community of practice** is: 1) made up of individuals with a shared domain of interest, 2) who build a sense of community through discussions, activities, and learning, 3) around a shared practice demonstrated through experience, methods, and common tools. A NAGPRA Community of Practice supports practitioners by providing opportunities to learn how to improve implementation of NAGPRA through regular interaction. Practitioners can request information, seek experience, reuse assets, coordinate and strategize, grow confidence, and discuss new developments.<sup>1</sup>

**NAGPRA practitioners** are individuals engaged in the practice of implementing NAGPRA. They most commonly work for museums, tribes, or federal or state agencies, but compliance takes place across multiple disciplines, industries, and professions. NAGPRA practitioners may include staff, tribal members, university faculty, Native American religious leaders, volunteers, contract employees, consultants, students, researchers, or a wide variety of additional roles. Individuals not directly engaged in NAGPRA implementation may have a professional or personal interest in NAGPRA and could also be part of a NAGPRA Community of Practice.



# Creating a Community of Practice



Cultivating a NAGPRA Community of Practice summit participants included twenty-four museum NAGPRA practitioners from twenty-two institutions around the U.S. Photo courtesy of Sarah Norlin

On March 25 and 26, 2019, the University of Denver Museum of Anthropology (DUMA) hosted twenty-four museum NAGPRA practitioners for a two-day summit to identify issues affecting NAGPRA implementation in museums and brainstorm ways to impact those issues. This gathering was part of a larger initiative to create a community of NAGPRA practitioners across the U.S. in order to increase capacity for implementation in museums, improve overall engagement of the museum field with ongoing NAGPRA work, and decrease misunderstanding and confusion still associated with NAGPRA among some museum professionals. This project is made possible in part by the Institute of Museum and Library Services (MG-70-18-0050-18).

In preparation for the summit, DUMA collected survey responses from NAGPRA practitioners (and non-practitioner museum professionals) to ensure a broad range of concerns were captured and included for discussion on the summit agenda. Preliminary results were divided into three handouts distributed to participants throughout the two days. The first handout (Appendix A), given to participants upon arrival, provided a summary of survey respondents, including geographic location, number of staff responsible for NAGPRA compliance, and knowledge level of respondent.



# Identifying Issues Affecting NAGPRA in Museums

To open the summit, participants shared the issues they see affecting NAGPRA implementation at their institutions and in the broader museum field. From the beginning, it was clear that participants held very diverse opinions on multiple aspects of NAGPRA implementation. Despite these differences, participant comments revealed the following reoccurring themes:

- limited support from upper level staff, administrators, and decision makers
- inadequate funding and too few staff dedicated to NAGPRA implementation
- disagreement around cultural affiliation determinations
- access to and control of collections (i.e. collections split among institutions or under the control of federal agencies)
- the legacy of colonialism/white privilege inherent in museums
- incomplete or incorrect catalogue information for Native American museum collections
- different interpretations and understanding of NAGPRA law, regulations, terms, purposes, and goals
- lack of support for small museums with limited to no capacity for NAGPRA work
- polarized discourse around repatriation
- problems initiating contact with tribal representatives, including knowing who to contact and confirming contact information
- differences of opinion regarding what constitutes consultation

Participants broke into small groups for indepth discussions to identify core issues affecting NAGPRA implementation in museums. To help broaden discussion beyond personal experience, participants received the second handout (Appendix B) of preliminary survey results: barriers affecting NAGPRA implementation and opinions on how NAGPRA is being implemented. From the discussions, five core issues emerged:

- A. Current NAGPRA training is not targeted to museum practitioners, doesn't acknowledge the complexities of implementation, and is not easily accessible to all practitioners.
- B. Museum administrators, board members, and other decision makers who are in the position to prioritize resources for implementation do not understand NAGPRA requirements and procedures.
- C. NAGPRA practitioners are not engaging in real collaboration and clear communication. For example, museum practitioners do not regularly include tribal practitioners in goal setting and project development and are not always transparent about decision making.
- D. Perception that some museums prioritize their duty to keep collections and make them accessible to researchers over compliance with NAGPRA.
- E. Practitioners and non-practitioners have different understandings of NAGPRA law, regulations, and terminology.



# Brainstorming Responses to Museum NAGPRA Issues

In groups and on their own, participants brainstormed ways to address each of the five issues. Prompts encouraged participants to think about how the issues were already being addressed and what might be missing. To support discussion, participants received the third handout (Appendix C) of preliminary survey results: what practitioners say they need to improve their ability to implement NAGPRA and what practitioners say they can do to help support implementation throughout the NAGPRA community.

From the participants' suggestions, three main approaches emerged: teaching and learning, document and resource sharing, and connecting practitioners. A summary of the responses to each issue follows.



## Issue A

To improve the content and delivery of NAGPRA training that addresses the complexity of on-the-ground implementation as well as provide additional learning opportunities for NAGPRA practitioners, summit participants proposed webinars and videos, conference workshops, peerto-peer networking, and resource and document sharing. Comments from participants raised concerns about who would develop training material and whether or not NAGPRA practitioners could agree on teachable practices. Participants stressed the importance of training materials being developed and presented in collaboration with tribal practitioners.

### Webinars and videos

Create short, on-demand webinars and videos that focus on specific topics designed with different audiences in mind. Created by practitioners, these would address the complexity of NAGPRA implementation. Participants acknowledged that the National NAGPRA Program already has a series of webinars and videos that should be considered so as not to recreate what is already available.

# Conference workshops

Organize workshops and sessions at conferences and meetings that NAGPRA practitioners attend. Create a list of conferences and potential topics to encourage practitioners to present. Because the regional context plays a key role in NAGPRA implementation and potential practitioners from small museums may need extra support, presentations should be made at local and regional conferences. Tribal practitioners should be included in the development and presentation of sessions and workshops aimed at museum practitioners.

# Peer-to-peer networking and support

Create opportunities for peer-to-peer networking and mentoring relationships by connecting practitioners doing similar work. In many cases, an experienced practitioner supporting a less experienced colleague can make NAGPRA implementation possible at an institution with little to no capacity. As NAGPRA practitioners, we can share our own experiences as well as learn from our colleagues.

# Document sharing

Compile resources to help NAGPRA practitioners improve their own practice such as examples of strategic plans, policies and procedures, and sample grant proposals. Make these documents accessible via a website or cloud-based file sharing.



## Issue B

Summit participants suggested ways to educate and engage high level administrators, board members, and other decision makers in order to increase their understanding of NAGPRA requirements and procedures. They recommended creating procedures to institutionalize NAGPRA implementation and shared ideas for mitigating limited money and staff that can be the result of lackluster institutional support.

# Building support

Create short, on-demand webinars and videos to educate administrators on an institution's responsibilities under NAGPRA, staffing and resources necessary for implementation, and the consequences of non-compliance, including examples of investigations and negative press coverage. Find ways to include administrators in the process so they gain a first-hand appreciation of the importance and complexity of NAGPRA implementation.

# Creating procedures

Foster visibility and transparency of NAGPRA implementation within an institution by creating reporting mechanisms and other procedures that reinforce the ongoing importance of NAGPRA. Share examples of NAGPRA policies, roles, and responsibilities to support practitioners wishing to advocate for increased support for NAGPRA work at their own institutions.

# Mitigating limited resources

Include activities that support NAGPRA implementation in projects with higher institutional priority such as broader collection management initiatives or curatorial research. Seek funding for projects that include NAGPRA related activities from granting agencies such as the National Endowment for the Humanities (NEH), National Science Foundation (NSF), and Institute of Museum and Library Services (IMLS).



### Issue C

Discussion indicated that NAGPRA implementation would improve with better collaboration and communication between practitioners, especially between museum, tribe, and federal practitioners. Comments from participants pointed out that expectations around collaboration and communication can vary greatly among individuals, institutions, tribes, and federal agencies. To encourage real collaboration and clear communication, summit participants suggested creating and maintaining a directory of NAGPRA practitioners as well as compiling templates and guides to support consultation. Participants provided examples of practices for improving collaboration and communication and building relationships that would further NAGPRA implementation and have benefits beyond NAGPRA.

## Directory of NAGPRA practitioners

A directory of NAGPRA practitioners could help with a basic barrier to communication – identifying who to contact. Some institutions and organizations may already have local or regional contact lists that could be combined into a larger directory. For example, History Colorado and the Colorado Commission of Indian Affairs (CCIA) produce a regularly updated contact list that is readily available to practitioners wishing to contact tribes with a legacy of occupation in Colorado. Tribal practitioners could benefit from a similar contact list of NAGPRA contacts for federal agencies and museums.

## Consultation guides and policies

Compile and share consultation case studies, policies, and procedures. By documenting and sharing consultation procedures, practitioners can encourage transparency and clarify expectations at the beginning of a project, empowering consulting parties to advocate for their own procedures.

# Model good practice

Model museum practices that encourage collaboration and communication and foster building relationships between NAGPRA practitioners. Make sure all parties that should be at the table are present from the beginning. Acknowledge different ways of knowing and respect the right of tribes to change their approach to NAGPRA over time. Many comments recognized that for true collaboration, practitioners need to allow adequate time, get buy-in from leadership, and be transparent and honest throughout the process. To justify the importance of collaboration and communication, share examples of benefits beyond NAGPRA implementation such as improved interpretation and care of collections.



### Issue D

Participant comments and survey responses highlighted a perception that some museums prioritize a duty to curate collections in perpetuity and make them accessible to researchers over implementing NAGPRA. Many of the responses to this issue during the brainstorming activity (and comments to the draft report) suggested that this perception was problematic or incorrect. In addition to access to collections, participants discussed issues around access to archival records, such as photographs and field notes.

Some participants suggested that a museum's fiduciary duty to public service requires museum practitioners to recognize the boundaries of NAGPRA. They suggested that museums need to balance their responsibilities under NAGPRA with their responsibility to steward collections, repatriating or transferring collections only when NAGPRA legally requires it.

Other participants emphasized the human rights aspects of NAGPRA, as well as the primacy of federal law. They proposed that to best serve the public and best care for collections, Native American communities must make decisions in partnership with museums regarding human remains and cultural items. Participants recognized that laws and professional ethics change over time and museum practice is not the same as it was thirty years ago. The International Council of Museums (ICOM) Code of Ethics

for Museums specifically calls for the care, research, and display of human remains and material of sacred significance to be "consistent with the interests and beliefs of members of the community, ethnic or religious groups from which the objects originated, where these are known."iii

As federal law, NAGPRA acknowledges that Native Americans have suffered from unjust treatment, particularly concerning their ancestral remains, funerary belongings, ceremonial practice, and cultural sovereignty. NAGPRA directly addresses the concern that implementation conflicts with a museum's fiduciary duties: "Any museum which repatriates any item in good faith pursuant to this Act shall not be liable for claims . . . of breach of fiduciary duty, public trust, or violations of state law . . . " (25 U.S.C 3005(f))iv Although museums have ethical and legal obligations to hold collections in trust for the public, participants pointed out that deaccessioning is a common and ethically accepted practice and institutions may transfer collections for many reasons.

While the brainstorming activity responses for this issue resulted in minimal actionable items, participants did suggest creating webinars and videos to highlight the risk of non-compliance, entering into agreements with Native American tribes to curate repatriated collections, and offering to transfer or loan non-NAGPRA collections to tribal museums.



## Issue E

To address the issue that NAGPRA practitioners (and non-practitioners) can have very different interpretations of the law and regulations, as well as different understandings and use of language related to NAGPRA, participants made recommendations for connecting practitioners and sharing information. The different approaches to and understanding of NAGPRA implementation can result in misunderstandings between practitioners that significantly hinder implementation. Two topics that came up repeatedly in discussion and elicited the strongest divergent opinions were: 1) the transfer of non-NAGPRA items to Native American tribes, and 2) implementation of the Disposition of Culturally Unidentifiable Human Remains regulation (43 CFR §10.11). Participants also discussed museum practitioners' limited legal expertise as well as the lack of NAGPRA implementation experience among lawyers and the courts.

### Resources

Create a framework for understanding different approaches to NAGPRA. Collect case studies that demonstrate how practitioners interpret the law through implementation activities and decision-making. Share templates and policies to encourage more consistency among practitioners. Connect practitioners so they can share practices that have worked for them. Possible platforms for sharing these resources include a website, cloud based file sharing, or listsery discussions.



# **Next Steps**

Following the two-day summit, participants reported that they felt their opinions were heard and their expertise was valued. Participants agreed that the summit contributed to the future of NAGPRA, a future they feel good about overall. Some participants shared steps they planned to take once they returned to their institutions, including drafting NAGPRA policies, collaborating with local/regional NAGPRA practitioners, and identifying conference or publication opportunities.

The summit and the larger initiative to create a network of NAGPRA practitioners across the U.S. began with a focus on implementation in museums. Based on survey results, summit discussions, and conversations with practitioners across the NAGPRA community, we believe implementation in museums will only improve if NAGPRA practitioners from museums, tribes, federal and state agencies, and other disciplines, can come together on a regular basis to learn from each other. As a result, NAGPRA implementation should improve not only in museums, but across the NAGPRA community. **Therefore, the NAGPRA Community of Practice will be for all practitioners.** 

The biggest priority post-summit is expanding our conversation about how a NAGPRA Community of Practice can support all practitioners and improve implementation. This conversation must include a broader representation of NAGPRA practitioners, especially representatives from tribes and federal and state agencies. To that end, we will create a listserv for NAGPRA practitioners to communicate with each other; share this Summit Report and preliminary survey results with the NAGPRA community; and encourage practitioners to host meet-ups and present sessions and/or workshops at conferences that NAGPRA practitioners attend. We will also present information on the summit, the survey, and the NAGPRA Community of Practice project to the NAGPRA Review Committee at a future meeting.

<sup>&</sup>lt;sup>i</sup> Etienne Wenger-Trayner and Beverly Wenger-Trayner, "Communities of practice a brief introduction," *Wenger-Trayner*, 2015, accessed May 14, 2019, <a href="https://wenger-trayner.com/introduction-to-communities-of-practice/">https://wenger-trayner.com/introduction-to-communities-of-practice/</a>



ii "Colorado Tribal Contacts: January 14, 2019," *History Colorado*, 2019, accessed May 23, 2019, https://www.historycolorado.org/sites/default/files/media/document/2019/1550.pdf
iii "ICOM Code of Ethics for Museums," International Council of Museums, accessed June 7, 2019,

https://icom.museum/wp-content/uploads/2018/07/ICOM-code-En-web.pdf.

The NAGPRA Review Committee is scheduled to meet in Fairbanks, Alaska, August 21-22, 2019.

iv (25 U.S.C 3005(f)). While some practitioners have questioned the applicability of the "good faith repatriation" provision to 43 CFR § 10.11 given the use of the term "disposition" instead of "repatriation," the Department of the Interior's position is that it does apply. See Department's response to Comment 37 on proposed 43 CFR 10.11 in "Native American Graves Protection and Repatriation Act Regulations—Disposition of Culturally Unidentifiable Human Remains," *Federal Register* 75, no. 49 (March 15, 2010): 12385, https://www.govinfo.gov/content/pkg/FR-2010-03-15/pdf/2010-5283.pdf

# Preliminary Survey Results – Handout #1

As part of an IMLS funded project, University of Denver Museum of Anthropology is conducting a nation-wide survey to collect information on the current state of NAGPRA implementation in museums and identify needs for the future.

Preliminary results collected from 358 respondents between January 23 and February 20, 2019.

# Survey distributed via:

- o project email list
- personal contacts
- professional organizations' newsletters,
   e-blasts, social media, and websites







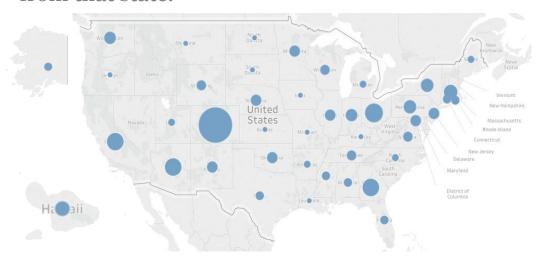
This is a research study from the University of Denver, Anne Amati, MA, Principal Investigator. This project was made possible in part by the Institute of Museum and Library Services, MG-70-18-0050-18.

More information: du.edu/duma | anne.amati@du.edu | 303-871-2687

# 235 Museum respondents completed the survey.

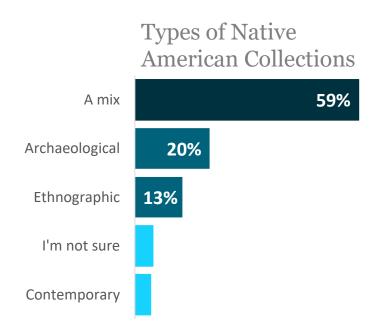
Not every respondent answered every question, so the sample size for each question varies.

States where museum respondents work. The larger the circle, the more responses from that state.

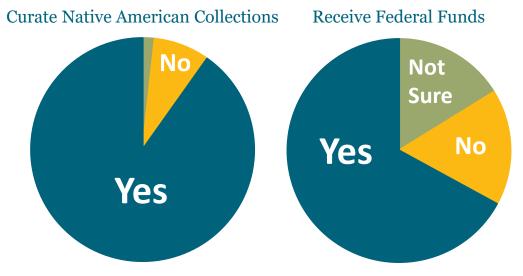


Museum Types (by collecting area)





Any museum that curates Native American collections and receives federal funds is required to comply with NAGPRA.



# Staff Responsible for NAGPRA per museum

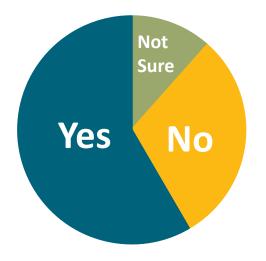
o-.5 Staff 14%

1-2 Staff 68%

3-4 Staff 15%

5+ Staff 3%

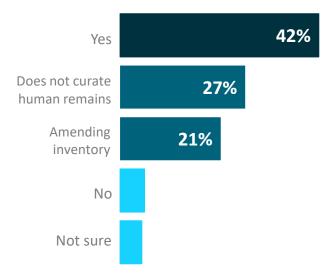
NAGPRA policies & procedures in place?



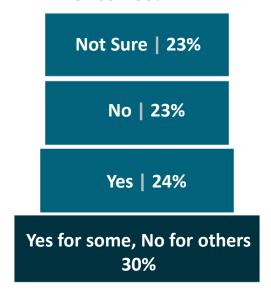
# In Compliance with NAGPRA?

Not required to comply	3%
Probably not	4%
No	9%
I think so	18%

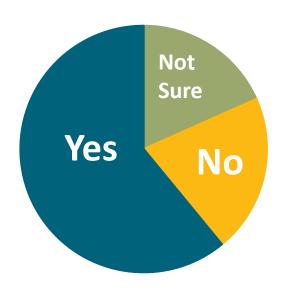
Completed inventories of Native American human remains?



Consult with tribes prior to decisions documented in inventories?

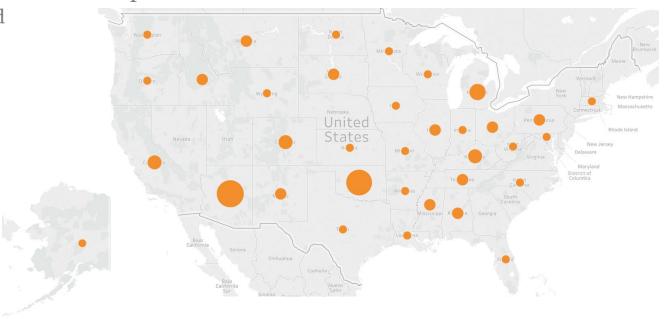


Consult with tribes on Section 6 summaries?



# 48 Tribe respondents completed the survey.

Not every respondent answered every question, so the sample size for each question varies. States where Tribe respondents work (some listed more than one state). The larger the circle, the more responses from that state.



Staff responsible for NAGPRA per tribe

o Staff 8%

1-2 Staff 49%

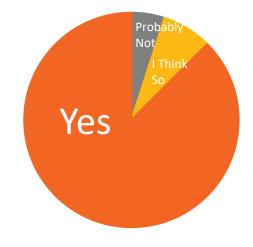
3-4 Staff **41%** 

5+ Staff 2%

NAGPRA/consultation policies & procedures in place?

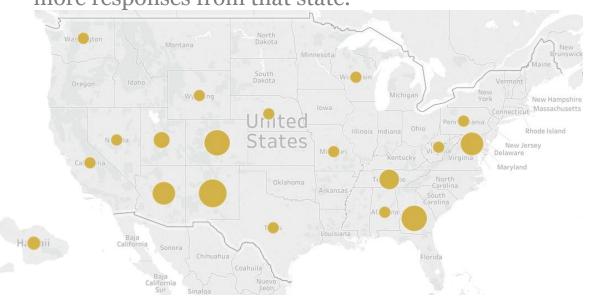
No	15%	
I'm not sure	8%	
Yes	77%	

Consulting with museums and federal agencies on NAGPRA implementation?



# 45 Federal Agency respondents completed the survey.

Not every respondent answered every question, so the sample size for each question varies. States where Federal Agency respondents work (some listed more than one state). The larger the circle, the more responses from that state.



Staff Responsible for NAGPRA Compliance per agency/office

1-3 Staff 49%

5-10 Staff 16%

11+ Staff 16%

Unknown 19%

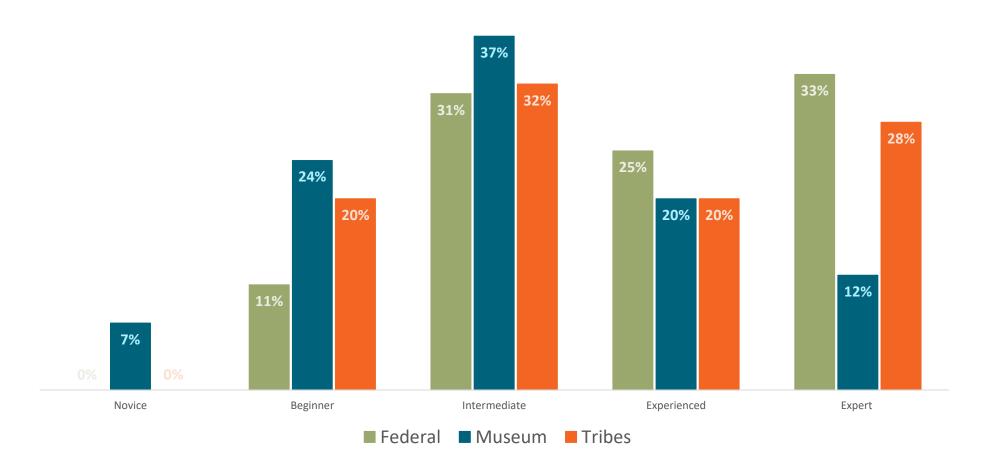
Consulting with museums and tribes on NAGPRA implementation?



NAGPRA/consultation policies & procedures in place?

No	8%
I'm not sure	3%
Yes	89%

# What is your knowledge level of NAGPRA requirements and procedures?





Most respondents rank themselves as intermediate; they "have training and have worked directly on NAGPRA implementation." What else besides training will help people increase their expertise?

# Preliminary Survey Results – Handout #2

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# How do the following barriers affect NAGPRA implementation in your museum?

31%

of respondents said that

limited staff hours and budget for NAGPRA work

are major barriers they face.

Reoccurring themes emerged in additional comments . . .

Institutions and individuals have other priorities

**19%** 

of respondents said that

incomplete, incorrect or inconsistent Native American collections

are a major barrier they face.

Limited documentation of complicated collections

16%

of respondents said that

staff turn-over and loss of institutional knowledge and personal relationships

Frustration with having to "start over"

are major barriers they face.

# How do the following barriers affect NAGPRA implementation in your museum?

9%

of respondents said that

limited expertise in Native American culture and/or cultural items & limited expertise in NAGPRA requirements and procedures are major barriers they face.

Reoccurring themes emerged in additional comments . . .

Education for non-NAGPRA practitioners such as administrators, volunteers, donors, and visitors

7%

of respondents said that

different priorities between museums, tribes, and/or federal agencies & lack of access to appropriate lands for reburial are major barriers they face.

Distorted expectations, appearance of stalling, and reluctance to cooperate

4%

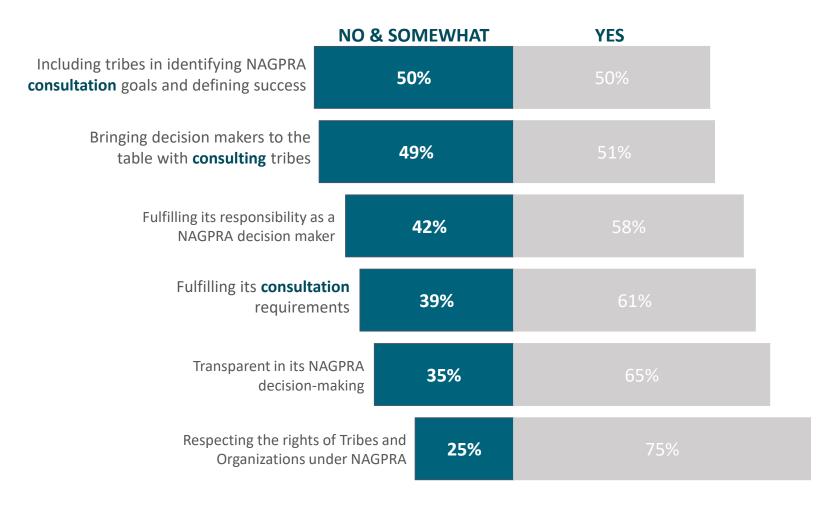
of respondents said that

institutional culture and/or policy in conflict with NAGPRA

Conflicts over preserving integrity of collections

is a major barrier they face.

# In your opinion, is your museum...?

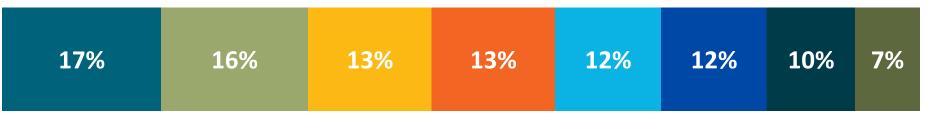




The areas where museums report falling short all revolve around **consultation**.

What makes for a successful consultation? Where can we look for examples of good consultation practices?

# In your experience, how do you see the following barriers affecting NAGPRA implementation?



17% | Limited staff hours and budget for NAGPRA work

16% | Museum(s) Native American collections are incomplete, incorrect, or inconsistent

13% | Different priorities between museums, tribes, and/or federal agencies

13% | Institutional culture and/or policy in conflict with NAGPRA

12% | Limited expertise in NAGPRA requirements and procedures

12% | Limited expertise in Native American culture and/or cultural items

10% | Staff turn-over and loss of institutional knowledge and personal relationships

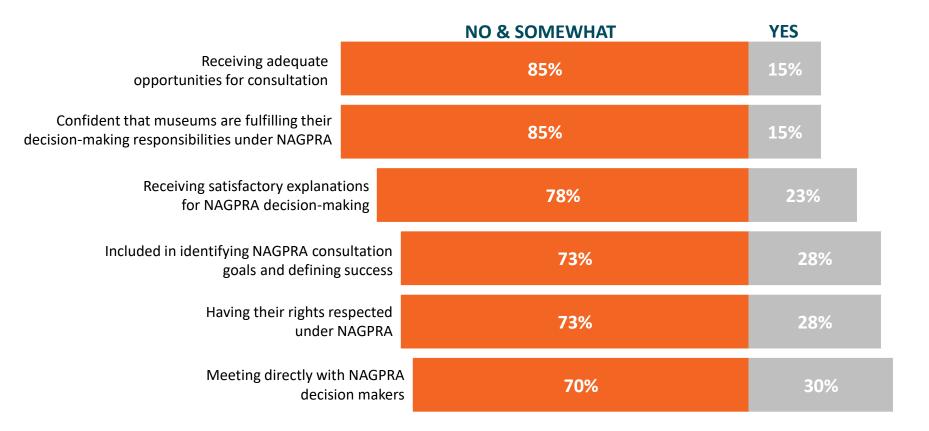
7% | Lack of access to appropriate lands for reburial



Generally, the major barriers were ranked fairly evenly, suggesting that there are many barriers to NAGPRA implementation from a tribal perspective.

What differences emerge in barriers faced by tribes & museums? How can we address some of these issues?

# In your opinion, is your tribe . . .

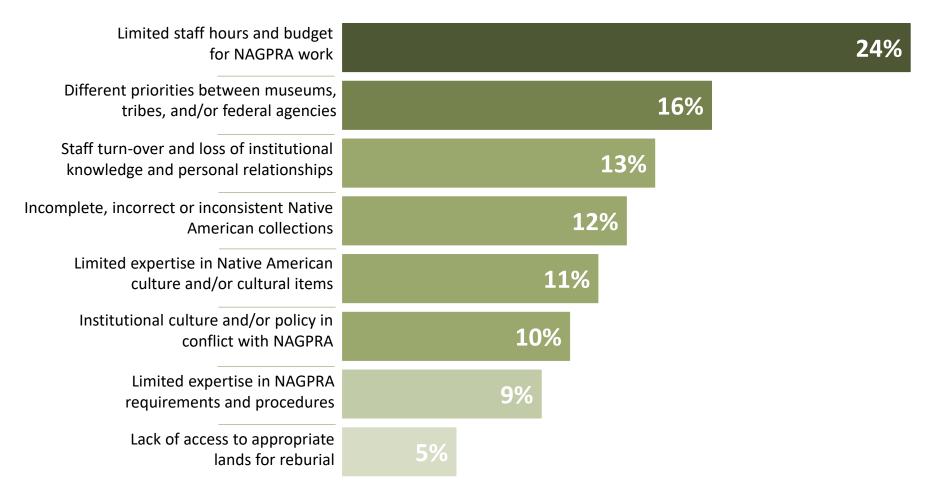




It appears that overall tribe respondents do not feel fully engaged as partners in this work, often times in contrast to the outlook museum's have on the same indicators.

What are some of the factors that could lead to this?

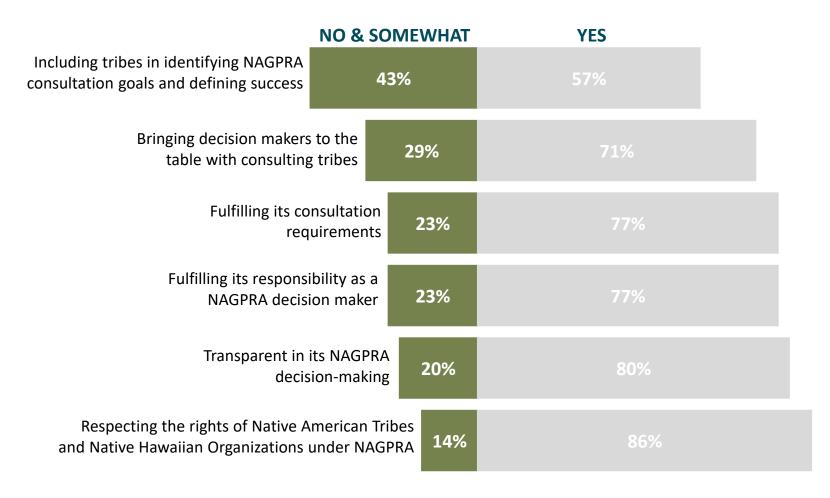
# In your experience, how do see the following barriers affecting NAGPRA implementation?





How are museums affected by these barriers? How do we advocate for NAGPRA as a priority?

# In your opinion, is your agency...?





Generally, Federal Agencies rate themselves higher than museums. What can be learned from this? What resources can be shared? Are there disconnects between these ratings and tribal ratings?

# Preliminary Survey Results – Handout #3

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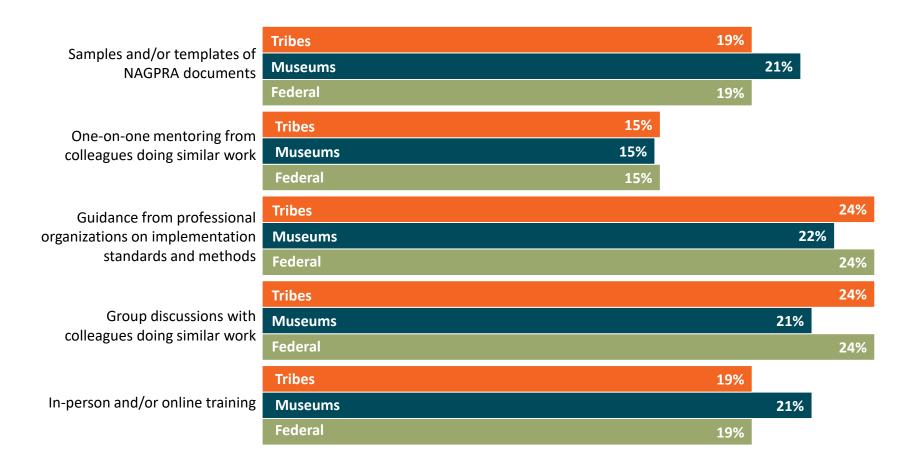




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# Which of the following would improve your ability to implement NAGPRA? By topic.





There is a great deal of agreement on this question; tribes and federal agencies rated each option identically. Museums varied only slightly.

# Which of the following would improve your ability to implement NAGPRA? By entity.

	Samples and/or templates of NAGPRA documents		19%	
	One-on-one mentoring from colleagues doing similar work	15%	2370	
Tribes	Guidance from professional organizations on implementation stan	dards and methods		24%
	Group discussions with colleagues doing similar work			24%
	In-person and/or online training		19%	
				40/
	Samples and/or templates of NAGPRA documents		2	1%
	One-on-one mentoring from colleagues doing similar work	15%		
Museum	Guidance from professional organizations on implementation stan	dards and methods		22%
	Group discussions with colleagues doing similar work			21%
	In-person and/or online training			21%
	Samples and/or templates of NAGPRA documents		19%	
	One-on-one mentoring from colleagues doing similar work	15%	1370	
Federal				2.404
rederal	Guidance from professional organizations on implementation stand	dards and methods		24%
	Group discussions with colleagues doing similar work			24%
	In-person and/or online training		19%	

# **HOW CAN YOU SUPPORT NAGPRA?**

# What can you/your institution do to help support implementation throughout the NAGPRA community?

