



UNIVERSITY OF CALIFORNIA

James B. Milliken
President

June 17, 2026

Office of the President
1111 Franklin Street
Oakland, CA 94607

universityofcalifornia.edu

The Honorable John Laird
Chair, Joint Legislative Budget Committee
1020 N Street, Room 502
Sacramento, California 95814

Dear Senator Laird:

Pursuant to Section 92618 of the Education Code, enclosed is the University of California's annual report to the Legislature on California Native American Graves Protection and Repatriation Act Compliance.

If you have any questions regarding this report, Associate Vice President Cain Diaz would be pleased to speak with you. Cain can be reached by telephone at (510) 987-9350, or by e-mail at Cain.Diaz@ucop.edu.

Sincerely,

James B. Milliken
President

Enclosure

CAMPUSES

Berkeley
Davis
Irvine
UCLA
Merced
Riverside
San Diego
San Francisco
Santa Barbara
Santa Cruz

MEDICAL CENTERS

Davis
Irvine
UCLA
San Diego
San Francisco

NATIONAL LABORATORIES

Lawrence Berkeley
Lawrence Livermore
Los Alamos

DIVISION OF AGRICULTURE AND NATURAL RESOURCES

cc: Senate Budget and Fiscal Review
The Honorable Lena Gonzalez, Chair
Senate Budget and Fiscal Review Subcommittee #1
(Attn: Mr. Diego Lopez)
(Attn: Mr. Kirk Feely)
The Honorable David A. Alvarez, Chair
Assembly Budget Subcommittee #3
(Attn: Mr. Christian Griffith)
(Attn: Mr. Tobias Wolken)
Mr. Hans Hemann, Joint Legislative Budget Committee
Ms. Jessica Holmes, Department of Finance
Ms. Jessica Deitchman, Department of Finance
Ms. Gabriela Chavez, Department of Finance
Mr. Gabriel Petek, Legislative Analyst Office
Ms. Jennifer Pacella, Legislative Analyst Office
Ms. Florence Bouvet, Legislative Analyst's Office

Provost and Executive Vice President Katherine S. Newman
Senior Vice President Meredith Turner
Executive Vice President and Chief Financial Officer Nathan Brostrom
Vice President Theresa A. Maldonado
Associate Vice President and Director Kathleen Fullerton
Associate Vice President Cain Diaz
Executive Director Kathleen Erwin

Report to the State Legislature on California Native American Graves Protection and Repatriation Act Compliance

The University of California provides the following annual report in response to Article 2.9, Section 92618 of the California Education Code, "California Native American Graves Protection and Repatriation Act Compliance," which states:

(a) As used in this article, the following definitions apply:

(1) "Act" means the California Native American Graves Protection and Repatriation Act of 2001 established pursuant to Chapter 5 (commencing with Section 8010) of Part 2 of Division 7 of the Health and Safety Code.

(2) "Institution" means a campus of the University of California.

(b) On or before June 30, 2024, and annually thereafter, the University of California is strongly urged to report each institution's progress towards completing repatriation pursuant to the act.

(c) The office of the President of the University of California is strongly urged to provide available funding to sufficiently support each institution's efforts towards completing repatriation pursuant to the act.

(d) The University of California is strongly urged to prohibit use of any Native American human remains or cultural items for purposes of teaching or research at the University of California.

EXECUTIVE SUMMARY

As of 2025, the University of California has repatriated 9,303 of the 17,115 Native American ancestors held by UC. UC has also repatriated 256,691 associated funerary objects and 57,398 other cultural items. These numbers reflect a significant increase in repatriation activity as a result of tribal engagement, California legislation, and a deepened UC commitment. To further advance the process, UC has set systemwide goals for 2028 and enacted new oversight measures. UC is responding to recommendations made by the State Auditor in 2025. In recognition of its ethical responsibilities, UC also seeks to compensate Tribes for consultation and repatriation costs using \$3 million designated for this purpose in FYs 2025-2028.

BACKGROUND

The University of California (UC) is committed to living up to its responsibilities for compliance with the spirit and letter of the Native American Graves Protection and Repatriation Act (NAGPRA). UC embarked on substantial revisions to its Native American Cultural Affiliation and Repatriation Policy ([UC NAGPRA Policy](#)) in 2019 and formed Systemwide and campus [NAGPRA committees](#), nominated by the Native American Heritage Commission (NAHC). Key new policy requirements include: inviting consultation early and often throughout the repatriation process; seeking guidance on handling and duty of care; deferring

to Tribal Traditional Knowledge as expert opinion; and compensating Tribes for the costs of consultation and repatriation. These new requirements have resulted in a measurable increase in repatriation across the UC system. UC has also adopted other measures at the urging of Tribes, such as restricting research, teaching, or loans without Tribal consent and requiring campuses to encourage and facilitate repatriation by government agencies and other institutions.

These reforms are supported by an expanded staffing strategy across UC. Twenty new staff positions have been created systemwide since 2019, with an additional nine new positions currently open for hire. The seven UC campuses with known Native American collections each employ full-time repatriation coordinators. Furthermore, each UC campus has a Chancellor's Designee for NAGPRA to facilitate open communication with senior campus leadership and to ensure NAGPRA programs receive adequate campus funds and other resources.

UC seeks to maintain its momentum and increase transparency and accountability measures, while centering core principles of respect for Tribal sovereignty and sustained, meaningful consultation.

UC REPATRIATION PROGRESS

Repatriation Process

The figure below breaks down the NAGPRA process, as outlined in federal regulations,¹ into three essential phases. Institutions must first compile their records and invite Tribes to consult on Native American ancestors and to identify cultural items. UC strives to reach consensus with consulting Tribes before submitting a NAGPRA Notice to the Federal Register. Each Notice describes the ancestors or cultural items and lists the culturally affiliated Tribes. Finally, after the Notice is published and a 30-day federally required waiting period has passed, institutions may repatriate ancestors or cultural items claimed by a federally recognized Tribe. Once repatriation is complete, at the Tribe's discretion, UC will continue to work with them for physical transfer and/or reburial, offering funding to the greatest extent possible. If a Tribe is not immediately ready to receive the ancestors or cultural items, they are welcome to request a Held-in-Trust agreement with UC for continued care at the campus until the Tribe is ready.

Figure 1. Essential phases of the federal NAGPRA process.



Consultation

From July – December 2025, UC campuses contacted 327 Tribes to invite consultation. Campuses sent 1,803 outreach or consultation communications and conducted **185 consultation meetings** with tribal representatives. Campus repatriation coordinators and tribal representatives typically discuss various topics, including cultural affiliation, protocols for handling or storage, language to be used in Federal Register Notices, the claims process, reburial or physical transfers, and UC funding support.

Federal Register Notices

In 2025, UC published **51 Notices** in the Federal Register. Figure 2 shows UC's rate of publication of Federal Register Notices since 1993.

UC previously published 88 Notices over 26 years (1993-2018) and has published 142 Notices since reforms were made to its repatriation practices (2019-2025). All published Notices cumulatively represent

¹ [43 C.F.R. §§ 10.9 and 10.10.](#)

13,862 of the 17,115 ancestors held by UC, as well as 399,410 associated funerary objects and 65,663 other cultural items identified by Tribes as having sacred importance.² As campuses continue consultation with Tribes, many more cultural items are expected to be identified for repatriation.

Federal Register Notices, 1993-2025

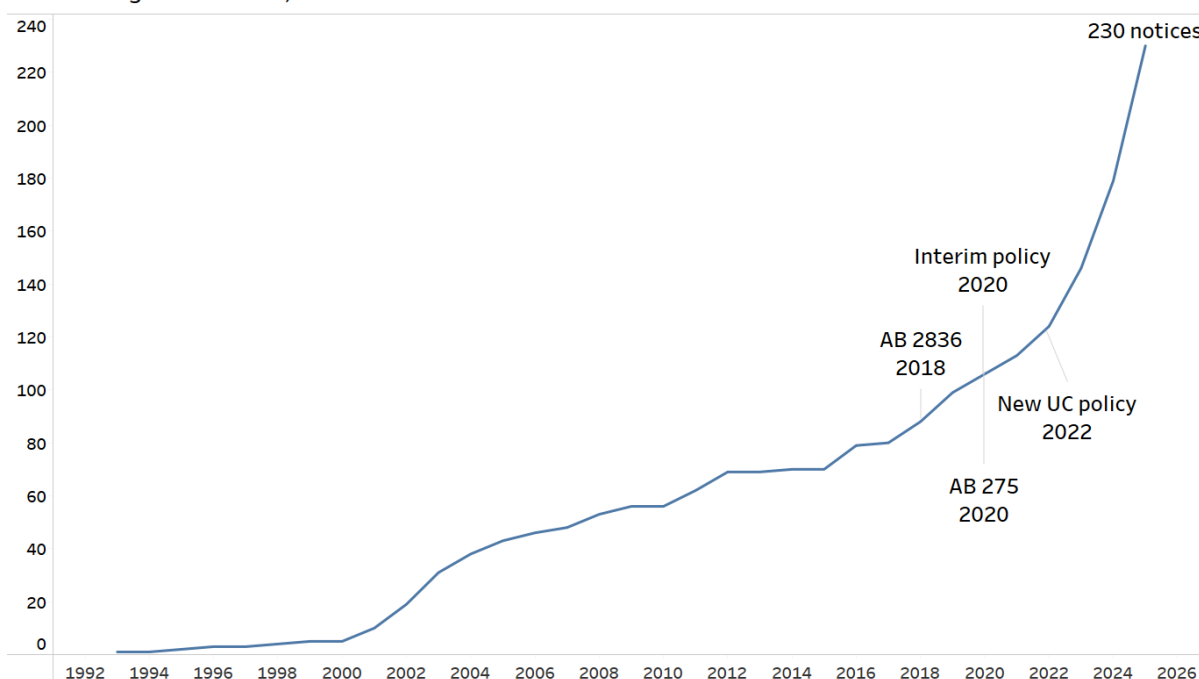


Figure 2. Number of Federal Register Notices published by UC, 1993-2025.

² These counts may differ from the numbers in published in the Federal Register as NAGPRA Notices often count items by lots (e.g. one lot of ceramic sherds instead of 100 individual sherds) depending on Tribal preference. For more information, refer to the “Clarification on counts” tab of the [UC Repatriation Dashboard](#).

Repatriation

In 2025, UC completed **52 repatriations** for 3,033 ancestors of the 17,115 held by UC, 34,268 associated funerary objects, and 499 other cultural items. Figure 3 shows the rate of increase in UC repatriations since 1993.

UC previously completed 57 repatriations over 26 years (1993-2018) and since reforms were made, has completed 156 repatriations (2019-2025). Cumulatively, UC has repatriated 9,303 of the 17,115 Native American ancestors held by UC, 256,691 associated funerary objects, and 57,398 other cultural items.

Repatriations, 1993-2025

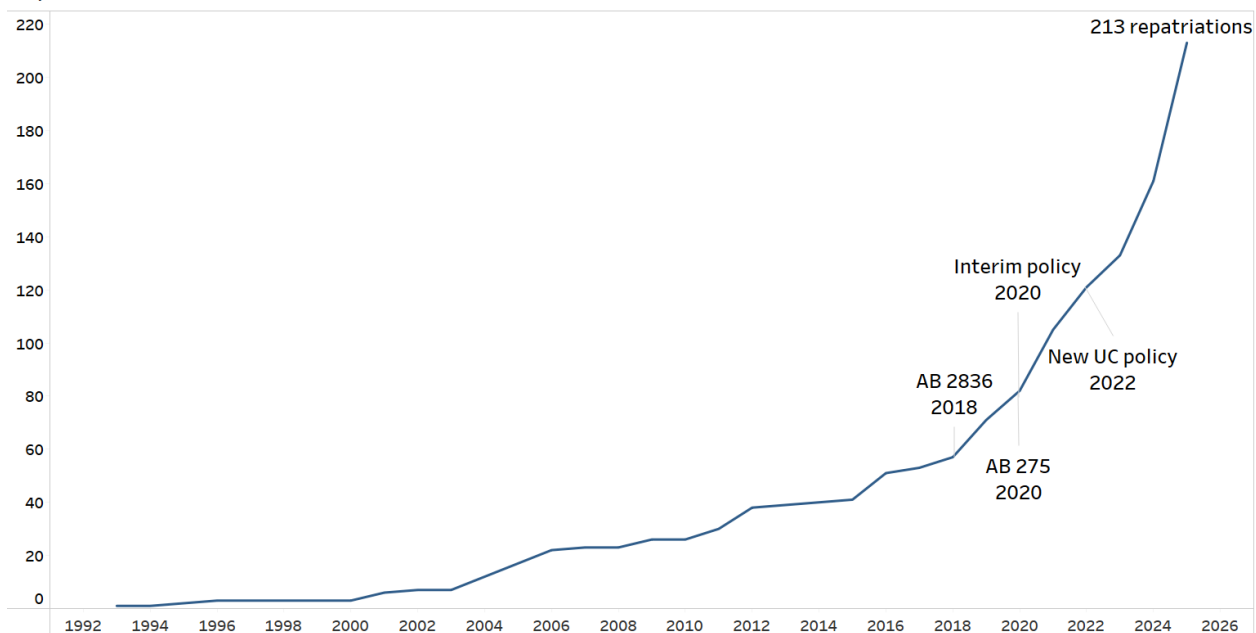


Figure 3. Number of repatriations completed by UC, 1993-2025.

Unrepatriated Ancestors and Cultural Items

There are 4,559 ancestors, 142,719 associated funerary objects, and 8,235 other cultural items listed in published Federal Register Notices that have not yet been repatriated. Under NAGPRA non-federally recognized Tribes do not have standing to submit claims³ and UC has not received claims from federally recognized Tribes for the vast majority of these ancestors and items. Nonetheless, UC is strongly committed to the return of these ancestors and cultural items and is exploring all available avenues to ensure these ancestors are not left behind.

³ For CalNAGPRA claims, see [NAHC FAQ](#).

TRIBAL SUPPORT FUNDS

As the institution which historically held the largest number of California Native American ancestors and cultural items, it is UC's goal and ethical responsibility to cover tribal expenses to the greatest extent possible. UCOP has established a process to compensate Tribes for consultation and repatriation costs using the \$3,002,400 designated exclusively for Tribal support for Fiscal Years 2025-2028. This funding, as well as the process to obtain the funds, has been communicated to all [California Indian Tribes](#). UC campuses have additionally reserved funding for Tribal support, and they will facilitate all payments to Tribes.

STATE AUDIT

On April 15, 2025, California State Auditor (CSA) released its latest [audit](#) on UC compliance with NAGPRA and CalNAGPRA. The report made recommendations in several areas where UC Office of the President (UCOP) could improve campus practices and systemwide oversight. UCOP issued directives to campuses to ensure compliance with the CSA recommendations. The recommendations and UC's corresponding actions are summarized below.

Dashboard

CSA recommended UC provide more information and clearer detail on the [UC Repatriation Dashboard](#) (by June 2026) to include counts of items that may be subject to NAGPRA, accession or site information, and an explanation about campus counting approaches and data limitations. UC has added this information to the dashboard. UC is also planning to make additional upgrades by August 2026 to include a map of holdings by campus by geographic area of origin, counts of consultations, and graphs on federal notices and repatriations.

Physical Reviews of Campus Spaces

CSA recommended that campuses establish schedules for the review of all locations for undiscovered collections, prioritizing high risk areas. Campuses have provided their schedules, and they are currently performing reviews, targeting review completion of high risk areas by the end of this month (June 2026). Campuses report to UCOP on their progress on a quarterly basis.

Stewardship

CSA recommended that UC expand its requirements for the storage of human remains and associated funerary items to include all other objects that may potentially be cultural items. In addition to issuing this directive, UCOP visited all campuses to ensure that storage spaces meet the appropriate standards. The CSA also recommended that campuses: identify all cases in which they have loaned UC NAGPRA collections; inform Tribes about the status; and begin retrieving such items. UC campuses have identified and recalled loans and informed Tribes of the status.

Systemwide Goals

Several of the CSA recommendations involved setting systemwide goals and increasing monitoring by UCOP. UCOP has set the following systemwide goals:

1. By December 2028, complete and submit all NAGPRA [Inventories](#) of Native American Human Remains and Associated Funerary Objects under UC control, unless otherwise requested by Tribes.
2. By December 2028, accelerate readiness to consult on all NAGPRA [Summaries](#) under UC control and increase proactive outreach to all Tribes.
3. By June 2026, review all areas of UC campuses with the highest probability of housing undiscovered Native American Human Remains and potential Cultural Items.

UC campuses with Native American collections have revised their repatriation implementation plans to describe how they will meet these goals. UCOP will monitor campus progress and evaluate annual campus budgets against this progress. The systemwide goals along with their associated metrics can also be viewed [online](#), and will be annually assessed and updated if needed.

Policy Update

To address CSA recommendations, UC will revise the [UC Cultural Affiliation and Repatriation Policy](#) to:

1. Require campus staff to review any campus area that they have a reasonable belief may be the location of undiscovered remains and potential cultural items.
2. Extend the storage standards that currently apply to human remains to also apply to all potential cultural items;
3. Acknowledge that repatriation to a non-federally recognized Tribe of remains and associated funerary objects with no affiliation to a federally recognized Tribe is no longer allowed by NAGPRA. The revisions will also specify that in cases where the only affiliations are to non-federally recognized Tribes, the campus should consult with those Tribes regarding reinterment of the remains and associated funerary objects.

UCOP has drafted the revisions and [California Indian Tribes](#) will be invited to comment. Once the Tribal comment period has been completed, UCOP will begin the internal UC policy review process, with the goal of finalizing the updated policy by January 2027.

Report to the Legislature on Tribal Support

The CSA recommended UC provide a report to the Legislature by January 2026 on the types of tribal costs UC will fund, the cost of compensating Tribes for consultation and reburial, and how much available funding UC has. This report has been completed but is being circulated for Tribal comment as requested by the Tribes during UC's December 2025 Tribal listening sessions. The report is expected to be finalized and submitted to the legislature by August 2026.

UC Santa Barbara

Finally, because the CSA found that UC Santa Barbara (UCSB) did not report on a few sites, the CSA recommended UCSB review its collections to determine if there are any others that have not been



reported and to submit any NAGPRA/CalNAGPRA required notices by June 2025. The campus immediately notified Tribes, National NAGPRA, and NAHC of the sites that were inadvertently left out of initial reporting and tribal outreach. UCSB has also reviewed all available information and determined that all known sites and potential cultural items have been reported appropriately.

UC hopes that this update demonstrates that the University is committed to improving its repatriation process and appreciates the continued interest of the legislature, as well as the indispensable advice, oversight and deep engagement of our tribal partners.

Contact Information:

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