



OFFICE OF THE VICE PRESIDENT – RESEARCH & INNOVATION

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December 14, 2022

CAMPUS CHANCELLOR’S DESIGNEES FOR NAGPRA/CALNAGPRA MATTERS

RE: 2021-2022 Report of the California State Auditor on UC’s Repatriation Efforts

Dear Chancellor’s Designees:

On November 17, 2022, the California State Auditor [released the report of its 2021-2022 audit](#) as required under the California Native American Graves Protection and Repatriation Act (CalNAGPRA)¹.

The Office of the President will be sending separate guidance regarding other findings and recommendations in the audit report, but I wanted to draw your attention to the following two items and request your assistance in implementing them on your campus:

Completion of Campus Repatriation Implementation Plans

The [UC Native American Cultural Affiliation and Repatriation Policy](#) (“UC Policy”) requires each campus with known NAGPRA/CalNAGPRA-eligible Human Remains or Cultural Items to develop a Repatriation Implementation Plan describing the campus’s plan, timeline, and budget needed to ensure timely and proactive repatriation of Human Remains and Cultural Items.

According to the Auditor, “To ensure that campuses fully repatriate their collections in a timely and consistent manner, the Office of the President should require the campuses to complete and submit detailed repatriation plans by February 2023 for review and approval by the campus NAGPRA committees and review by the systemwide NAGPRA committee. The repatriation plans should include a detailed budget.”

To allow sufficient time for review and approval by your Campus Committee and the Systemwide Committee before February 28, 2023, please ensure your campus Repatriation Implementation Plan is completed no later than **January 31, 2023**. Please also ensure that your campus budget plans include sufficient background and detail to clearly identify the resources and funding that will be needed to meet the stated repatriation goals. Please note this deadline is set in order to meet the Auditor’s deadline.

¹ Ca. Health & Safety Code § 8028: “The California State Auditor...shall conduct an audit commencing in the year 2019 and again in 2021 regarding the University of California’s compliance with the federal Native American Graves Protection Repatriation Act (25 U.S.C. Sec. 3001 et seq.) and this chapter. The State Auditor shall report its findings to the Legislature and to all other appropriate entities.”

Section VI of the UC Policy includes more specific information on the required content of the campus Repatriation Implementation Plan. The attached template document has previously been distributed to all Repatriation Coordinators to aid campuses in drafting their plans.

Appointment of Full-Time Repatriation Coordinators

The audit report notes that “the Office of the President does not require campuses to hire full-time repatriation coordinators even though the university’s NAGPRA policy specifies that these coordinators carry primary responsibility for a campus’s compliance with the university’s NAGPRA policy. As a result, some campuses with large NAGPRA collections have not hired individuals full-time in this position.” To that end, the Auditor states, “To ensure that campuses provide appropriate resources and oversight to the administration of NAGPRA and CalNAGPRA, the Office of the President should require campuses with more than 100 sets of remains or cultural items to have full-time repatriation coordinators by July 2023.”

To fully address this finding, all campuses with more than 100 sets of Human Remains or Cultural Items are hereby instructed to take all necessary steps to have in place a full-time Repatriation Coordinator, meeting all requirements of the UC Policy², no later than **July 31, 2023**.

Thank you for your continued assistance in UC’s efforts to bring Native American ancestors and their cultural items home. If you have any questions regarding the above matters, please contact me at Lourdes.DeMattos@ucop.edu or (510) 587-9850.

Sincerely,



Lourdes G. DeMattos
Director
Research Policy Analysis & Coordination

Attachment: Sample Repatriation Implementation Plan Template

cc: Provost and Executive Vice President Brown
Vice President Maldonado
Executive Director Motton
Chief Policy Advisor McAuliffe
Senior Principal Counsel Auriti
Research Policy Manager Miller
Research Policy Manager Perkins
Campus Repatriation Coordinators

² Section IV.B.4 states, “The Repatriation Coordinator must have an in-depth, demonstrated understanding of and direct experience with: (a) Consultation practices and processes, building and maintaining positive working relationships with Tribes; and (b) NAGPRA and CalNAGPRA.”