

## **NAGPRA EFFORTS: PAST, CURRENT, AND FUTURE**

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### **I. Past RLA NAGPRA Work (1989 through January 2024)**

The Research Laboratories of Archaeology's (RLA) efforts to comply with Native American Graves Protection and Repatriation Act (NAGPRA) began immediately before the law's passage with consultations between the RLA and UNC-Chapel Hill College of Arts and Sciences leadership and Associate University Counsel in 1989. The University supported the RLA in its NAGPRA compliance by funding a one-year position during the 1994-1995 academic year for conducting an inventory of Ancestors held by the RLA. The RLA also received a NAGPRA inventory grant from the National Park Service in 1995. In compliance with NAGPRA and the terms of the grant, the RLA consulted with Tribes by mail and also held two on-campus meetings with Cherokee and Catawba Tribes. In 1996, the RLA submitted an inventory of Ancestors and funerary objects to the National Park Service along with a separate document outlining the RLA's repatriation policies and procedures. Two notices of inventory completion, one for Cherokee-affiliated Ancestors and one for Catawba-affiliated Ancestors, were submitted to Tribes and National Park Service at this time.

Between 1999 and January 2024, the RLA has had four notices of inventory completion published in the Federal Register (Table 1) and has repatriated Ancestors and funerary objects from 24 sites (Table 2). Approximately 900 Ancestors presently in the care of the RLA have not been affiliated with a Tribe (Figure 1).

### **II. Current RLA NAGPRA Work**

The RLA is reviewing its research, exhibit, and curation practices to determine whether they are consistent with the new NAGPRA regulations published in December of 2023. Even prior to the publication of the new regulations, the RLA had begun to review and change some practices to be more consistent with emergent disciplinary norms regarding Tribal consultation prior to publication and exhibit of funerary objects. For example, in August 2023 all locked glass-front cabinets containing funerary objects in the RLA Curation Facility were covered with undyed cotton muslin cloth, and the portion of the facility housing Ancestors was screened off. The locations and significance of these reverential spaces were communicated to students and researchers.

Activities are underway to ensure that the RLA's practices are consistent with the new NAGPRA regulations. Many of these assessments will be ongoing until a new set of RLA policies can be developed in consultation with Tribes. These activities include reviewing:

- 1,301 3D models on the [RLA Sketchfab](#) site; 298 models of funerary objects have been removed pending consultation

- 807 media files on the [Archaeology at Carolina](#) website
- 110 digitally available RLA publications and reports (7750+ pages total) for images and line drawings of Ancestors and funerary objects; 180+ photographs and 100+ line drawings of Ancestors, funerary objects, and/or graves have been identified
- 7,163 media files on the [Ancient North Carolinians: A Virtual Museum of North Carolina Archaeology](#) website to identify images of funerary objects
- 73,188 media files in the [RLA Digital File Archive](#) hosted on the UNC Libraries Digital Collections Repository website for images of funerary objects
- 286,978 records (representing more than eight million artifacts) in the RLA Specimen Catalog for objects from burial contexts that had not been documented as funerary objects or unassociated funerary objects in the 1996 RLA NAGPRA Inventory

### **III. Future RLA NAGPRA Work: Moving Forward**

We seek to ensure the repatriation of all Ancestors, funerary objects, sacred objects, and objects of cultural patrimony in the RLA collections to the appropriate federally recognized Tribe or Tribes. Moving beyond compliance, we also seek to shape RLA policies and procedures in accordance with current best practices regarding research, exhibition, and care of archaeological materials related to the history of American Indian Tribes. Recognizing the central importance of traditional knowledge in achieving these goals, our work will be built around consultation with members of American Indian communities in North Carolina and beyond.

In our work, it is imperative that our efforts are guided by open communication and transparency with descendant communities, as well as with colleagues and students. We have reached out to begin consultation with federally recognized Tribes. Based on geographic and historical ties, each of these Tribes may have an ancestral interest in Ancestors or objects in RLA collections. We are also engaged in conversations with members of North Carolina's state-recognized Tribal communities, on campus, through the UNC American Indian Center, and off-campus through the North Carolina Commission of Indian Affairs and North Carolina American Indian Heritage Commission.

The RLA has applied for a NAGPRA consultation grant to help support this process. Through consultation with Tribes, we will affiliate ancestors and identify objects of cultural patrimony in RLA collections, as well as establish criteria for a NAGPRA inventory update. These consultations will also guide the development of RLA policies on collections-based research and fieldwork that will align with collaborative, inclusive, and community-based practice. In sum, we have a good deal of work ahead of us, and we view this work as a valuable opportunity to listen to, learn from, and build relationships with descendant communities whose heritage we wish to help steward.

Table 1. RLA NAGPRA Notices of Inventory Completion

<b>Federal Register Reference</b>	<b>National NAGPRA Reference</b>	<b>Published Date</b>	<b>Total Ancestors</b>	<b>Total Funerary Objects</b>	<b>Consulted Tribe(s)</b>	<b>Affiliation</b>	<b>Disposition</b>
64(152):43222-43223	99-20370	08/09/1999	211	2689	Eastern Band of Cherokee Indians, Cherokee Nation of Oklahoma, United Keetoowah Band of Cherokee Indians	Same as consulted	Repatriated
71(175):53473-53475	E6-14935	09/11/2006	202	613	Catawba Indian Nation, Cherokee Nation, Eastern Band of Cherokee Indians of North Carolina, North Carolina Commission of Indian Affairs, Tuscarora Nation, United Keetoowah Band of Cherokee Indians	Catawba Indian Nation	RLA under care agreement
83(36):7773-7774	2018-03631	02/22/2018	24	315	Eastern Band of Cherokee Indians, Cherokee Nation of Oklahoma, United Keetoowah Band of Cherokee Indians	Same as consulted	Repatriated
85(112):35435-35436	2020-12550	06/10/2020	3	0	Mississippi Band of Choctaw Indians, The Choctaw Nation of Oklahoma	Same as consulted	Repatriated

Table 2. RLA Repatriations 1999-2024

<b>RLA Site</b>	<b>Tribe</b>	<b>Notice of Inventory Completion</b>	<b>Repatriation</b>
Bn 29	Cherokee	1999	1999
Jk 2	Cherokee	1999	2003
Jk 129	Cherokee	1999	2003
Hw	Cherokee	1999	2012
Sw 3	Cherokee	1999	2012
Sw 7	Cherokee	1999	2012
Hw 1	Cherokee	1999	2013
Hw 2	Cherokee	1999	2013
Hw 7	Cherokee	1999	2013
Ma 34	Cherokee	1999	2014
Ce 1	Cherokee	1999	2015
Ce 15	Cherokee	1999	2015
Cy 42	Cherokee	1999	2015
Ma 2	Cherokee	1999	2015
MI 3	Cherokee	1999	2019
Ten 1	Cherokee	2018	2019
Ten 4	Cherokee	2018	2019
Ten 5	Cherokee	2018	2019
Ten 30	Cherokee	2018	2021
Ken 8	Cherokee	2018	2022
Ten 9	Cherokee	2018	2022
Ten 11	Cherokee	2018	2022
Miss 10	Choctaw	2020	2024
Miss 8	Choctaw	2020	2024

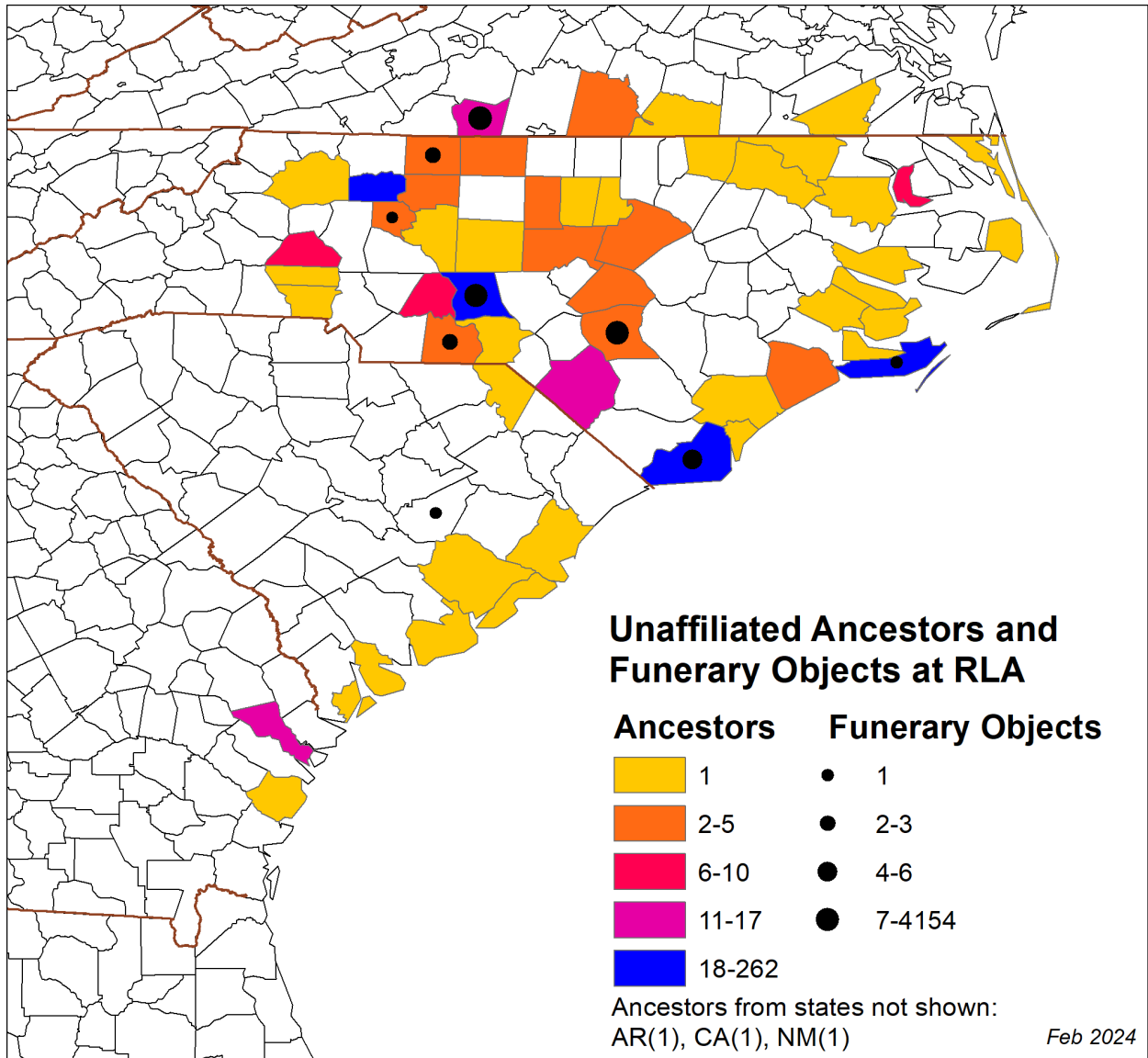


Figure 1. Location of Tribally Unaffiliated Ancestors and funerary objects on the 1996 NAGPRA Inventory.