

INDIGENOUS COLLECTIONS CARE GUIDE

Indigenous Collections Care Working Group

Edited by Laura Bryant & Marla Taylor



INDIGENOUS COLLECTIONS CARE GUIDE

Indigenous Collections Care Working Group

Edited by Laura Bryant & Marla Taylor



School for
Advanced
Research



INSTITUTE of
Museum and Library
SERVICES

Contents

ICC Working Group and Significant Contributors 06

Preface 08

Acknowledgments 10

Introduction 11

Core Values 16

Key Terms 18

Sections 23

Section 1
Relationship Building 24

Section 2
Decision-Makers and Points of Contact 31

Section 3
Indigenous Community Engagement with Collections 33

Section 4
Formalizing Shared Stewardship 35

Section 5
Facilitating Access 36

Section 6
Ethical Research 38

Section 7
Handling and Housing 45

Section 8
Cultural Care of Items and Spaces 52

Section 9
Conservation 54

Section 10
Risk Management 56

Section 11
Catalog Records and Databases 60

Section 12
Associated Documentation 65

Section 13
Imagery Protocols 69

Section 14
Reproductions and Imitations 71

Section 15
Loans 72

Section 16
New Acquisitions 75

Section 17
Non-Permanent Collections 79

Section 18
Deaccessions 80

Section 19
Self-Care 81

Section 20
Accountability and Advocacy 84

Case Studies 93

Building Research Relationships with Contemporary Native Nations

Dr. Aimée E. Carbaugh 94

Indian Arts Research Center Collections Review with the Pueblo of Zuni

Laura Elliff Cruz 96

Traces of Life: Honoring Evidence of Use During Conservation

Elly Stewart Davis 97

Collections Care Notices at the National Museum of the American Indian

Emma Dixon 99

Pinguat (Beads)

Amanda Lancaster 103

Stockbridge-Munsee Community's NAGPRA Database: A Method of Recordkeeping for the Future

Sara Restrepo 105

Institutional and Tribal Partnerships: 3D Models of Artifacts and Collections

Sarah Shepard 106

History Colorado and Long-Term Tribal Loans

Chance Ward 107

Bibliography 109

Appendix 121

2025 ICC Field-Wide Survey Results 122

US Laws Affecting Museum Collections 125

Administrative Handout 130

Sample Collections Access / Research Request Form 137

ICC Working Group and Significant Contributors

The Indigenous Collections Care (ICC) Working Group conceptualized, developed, and refined the creation of the *ICC Guide* from 2021 until its release in 2026. The Working Group was intentionally structured to include Indigenous and non-Indigenous representation from a broad range of museum-related experiences and backgrounds. Involvement and commitment naturally fluctuated with changes in jobs, life circumstances, and capacity.

Facilitators

Laura Bryant, Director of Repatriation,
Gilcrease Museum

Marla Taylor, Curator of Collections,
Robert S. Peabody Institute
of Archaeology

Grant Project Manager

Laura Eliff Cruz (Choctaw Nation of Oklahoma), Director of Collections,
School for Advanced Research

Core Group Members

We are deeply grateful to members of the ICC Working Group who have devoted many, if not all five, years to the creation of the *ICC Guide*.

Lisa H. Barrera, NAGPRA Registrar, UC Davis NAGPRA Project

Jan Bernstein, Founder, Bernstein & Associates NAGPRA Consultants

Shaleigh R. Howells, Independent Consultant, River to Ridge Consultants

LaLeña Lewark (Cherokee Nation), VP for Collections, Conservation and Exhibitions
at Autry Museum of the American West

Katelyn McMullin, Anthropology Collection Manager, University of Nebraska
State Museum

Nicolette B. Meister, Director and Repatriation Coordinator, Beloit College, Logan
Museum of Anthropology

Angela Neller (Kanaka O'iwai), Curator, Wanapum Heritage Center

Sylvanus Paul (Diné), Museum Specialist, National Museum of the American Indian

Sara Restrepo, Program Coordinator, Stockbridge-Munsee Community Tribal Historic Preservation Office

Dr. Jayne-Leigh Thomas, NAGPRA Executive Director, Indiana University

Colleen Utter (Sault Ste. Marie Tribe of Chippewa Indians), NAGPRA Associate, Communications & Coordination, University of Michigan

Current and Past Group Members

Special thanks as well to those who meaningfully participated in the shaping of the *ICC Guide* at key points in its development.

Jae R. Anderson (Diné), Independent Cultural Heritage Scientist

RaeLynn A. Butler (Muscogee [Creek] Nation), Secretary of Culture and Humanities, The Muscogee (Creek) Nation

Amanda Lancaster, Curator of Collections, Alutiiq Museum & Archaeological Repository

Dr. Veronica Pasfield (Bay Mills Indian Community), NAGPRA Officer, Bay Mills Indian Community

Donna Ruhl, former Florida Archaeology & Bioarchaeology Collections Manager, Florida Museum of Natural History

Dr. Jessie Ryker-Crawford (White Earth Chippewa), Professor Emeritus and former Dean of Academic Affairs, Institute of American Indian Arts

Dr. Jennifer Shannon, Manager of Outreach and Engagement Planning Office, National Museum of the American Indian

Tessa Shultz (Sičanǵu Lakota), Senior Manager of Outreach & Engagement, National Geographic Society

Dr. Krista Ulujuk Zawadski (Inuk [Nunavut]), Faculty Member, Dechinta Centre for Research and Learning

Kara Vetter, Senior Director of Cultural Resources, Museum of Us

Hallie Winter (ᐱᐱᐱᐱᐱᐱ), Collections Manager/Registrar, Osage Nation Museum

Preface

At the beginning of 2021, the ICC Working Group—twenty professionals from various museums, universities, Tribal Nations, and organizations throughout the United States—began meeting virtually each month to discuss the importance of integrating Indigenous perspectives into collections care. In these early discussions, the dream and goal for the *Indigenous Collections Care Guide* (*ICC Guide*) were born. Though membership naturally fluctuated, we maintained a committed and active group of approximately twenty Indigenous and non-Indigenous museum professionals and academics, Tribal Historic Preservation Officers (THPOs), and Native American Graves Protection and Repatriation Act (NAGPRA) coordinators and representatives. This blended and balanced effort created a guide with practical applications rooted in Indigenous perspectives, cultural beliefs, and priorities.

At each monthly meeting, the group took an intensive dive into a specific section of the *ICC Guide*. Co-facilitators Laura Bryant and Marla Taylor prepared language for each monthly conversation for group members to dissect and hone. Members safely and respectfully shared their personal and professional challenges, perspectives, and aspirations. The *ICC Guide* reflects and embraces these diverse voices.

Some group members also assisted in the creation of, or were inspired by, *Guidelines for Collaboration* and *Standards for Museums with Native American Collections* (SMNAC). Both documents were developed by the School for Advanced Research (SAR) and are complementary to the *ICC Guide*.¹

In 2023, the Institute of Museum and Library Services (IMLS) awarded SAR a National Leadership Grant for Museums to perform a full and robust review of the *ICC Guide*. We received feedback and edits in the form of conversations and written comments from 120 individuals who interact with Indigenous collections in museums. These people were gathered into nine small groups. Seven of the groups were composed of Tribal representatives, citizens, and museum professionals from both federally recognized and non-federally recognized Native Nations across the United States.

¹ The [*Guidelines for Collaboration*](#) is a resource for institutions that are collaborating with Native communities, or would like to. It is centered in collections and consultation, and offers actionable steps and a broad overview for collaboration and building relationships. It is complementary to the *ICC Guide* framework and Indigenous collections care considerations.

SMNAC, which addresses all areas of museum work and infrastructure, is for professionals working in museums holding Native collections of any size. It aligns Native goals with the American Alliance of Museums' Core Standards. The document lists broad functional areas and provides suggestions and goals for indigenizing those areas. The "Collections Stewardship" section of SMNAC complements sections of the *ICC Guide*.

The first seven conversations focused on reviewing the guide's content, structure, and scope. The remaining two groups were composed of non-Indigenous museum professionals. Their comments addressed the functionality and implementation of the guidelines, practices, and suggestions.

These conversations were supplemented with an iterative evaluation component. An independent evaluator, Laureen Trainer, offered surveys to session participants and conducted fifteen personal interviews. The surveys and interviews focused on feedback regarding the review process itself as well as the guide, and they were instrumental in informing the structure and process of future review sessions.

The *ICC Guide* offers actionable steps and considerations for the implementation of culturally appropriate collections stewardship. It is meant to be a living document, just like the practice of culturally appropriate care and the individuals engaging in it. The language used throughout embraces growth and change: It is not intended to be rigid. The language and practices detailed within specifically apply to cultural material related to Native American Nations and communities. The ideas and frameworks that engage with originating communities can inform stewardship of any collections. Here we use the term *Indigenous* because these specific collections and originating communities informed this guide.

The guide will be updated in approximately three-year increments, or as needed, by a subset of the ICC Working Group. Those updates will focus on adding or revising resources, case studies, and tools; addressing regulatory and legal shifts; and examining language and terminology.

Acknowledgments

The *ICC Guide* is a deeply collaborative project involving many organizations and Native Nations across the United States and Canada.

The *ICC Guide* has been made possible with the support of the Indian Arts Research Center at the School for Advanced Research and the Institute of Museum and Library Services (IMLS) National Leadership for Museums grant award.

Many thanks to the significant contributors and reviewers: Deanna Byrd (Mississippi Choctaw/Euro-Italian descent, Enrolled Citizen of the Choctaw Nation of Oklahoma); Jacqueline Cook; Patrick Cruz (Ohkay Owingeh); Domonique deBeaubien; Dr. Carlton Shield Chief Gover, Ckîri, Pâri (Wolf Band, Pawnee Nation); Cheryl Madrigal (Payomkawichum, Pauma Band of Luiseño Indians); Kelly McHugh; Justice McNeely (Iñupiaq); Curtis Quam (Pueblo of Zuni); and Chance Ward (Lakota—Cheyenne River Sioux Tribe).

We are also grateful to the 120 reviewers who participated in the nine content review discussions and provided invaluable feedback. We would especially like to thank those who have provided case studies, quotes, and templates.

Thanks to our partners who contributed invaluable services throughout the development, review, and completion of the *ICC Guide*. Laureen Trainer with Trainer Evaluations created surveys, conducted one-on-one interviews with content review participants, and consolidated results into reports. Copyeditor Jennifer Boynton streamlined text and polished the language. Designer Neebinnaukzhik Southall (Chippewas of Rama First Nation) of Neebin Studios created the layout, illustrations, and graphic components. Special thanks to SAR staff: Laura Elliff Cruz (Choctaw Nation of Oklahoma), Jorge Fonseca, Daniel Kurnit, Alexia Lozano, Bob Lujan, Elysia Poon, Melinda Robbins, Meredith Schweitzer, and Carla Tozcano.

We thank our key partners and sponsors in this project.



School for
Advanced
Research



INSTITUTE of
Museum and Library
SERVICES



THE PEABODY
THE ROBERT S. PEABODY INSTITUTE OF ARCHAEOLOGY



Gilcrease



Bernstein & Associates
NAGPRA Consultants

Finally, thank you to all of our colleagues for their support and insight throughout the development and creation of the *ICC Guide*.

Introduction

For centuries, museums and academic institutions have acquired and amassed Indigenous cultural materials for their own use and benefit, with minimal to no consideration for the descendant communities. By participating in as well as supporting the removal of cultural materials from their original context, museums have controlled both the public narrative of and access to Indigenous material culture. These colonial-based actions have disconnected cultural materials from their communities, thus perpetuating intergenerational trauma and loss of traditional knowledge.² These systemic barriers are manifested through all aspects of museum administration, including how the items are stewarded. Mainstream collections management “best practices” and nomenclature are limited and inadequate in terms of caring for the physical, intellectual, and spiritual needs of Indigenous cultural materials.

Formalizing “best practices” in policy documents is a relatively recent practice; the Smithsonian Institution, for example, first established its collections management policy in the 1970s. Around that same time, the fields of collections management and conservation began to become more professionalized. Indigenous communities, however, have been caring for their cultural material for millennia.

Since the 1980s, two interrelated shifts have redefined museum practice. The definition of *expertise* has expanded to include more diverse ways of knowing, and the concept of preservation has evolved beyond rigid materiality to embrace intangible cultural values and relational stewardship models. The *ICC Guide* builds on that evolution. We wish to recognize the many people whose contributions laid the foundation for the more inclusive collections care practiced today.

Purpose

The *ICC Guide* provides frameworks to respect and recenter collections stewardship practices around the needs and knowledge of Indigenous community members. It serves as a bridge between Indigenous community perspectives and traditional museum collections management practices—on the individual, community, and institutional level—to engage in thoughtful conversations about culturally appropriate care. The language of these two perspectives is therefore intentionally blended throughout the guide.

² See Amy Lonetree's *Decolonizing Museums: Representing Native America in National and Tribal Museums* (University of North Carolina Press, 2012) as well as “[C2C Care Course: Building Collaborations Between Museums and Indigenous Communities](#)” from the American Institute for Conservation and the Foundation for Advancement in Conservation.

Audience

This guide speaks to individuals engaged in collections stewardship within museums and other collecting institutions. It is aimed specifically at both emerging and established museum professionals as well as individuals who are seeking clarification, support, and validation to pursue culturally appropriate care.

The *ICC Guide* recognizes that administrative support is needed to implement many of the considerations mentioned here. The blended language provides collections professionals and Tribal representatives with the tools to advocate for change.

How to Use This Guide

The language and tone used throughout reflect the intention to offer *guidance*. You will not find explicit instructions on specific care needs or practices as these can vary by community and, in some cases, within a community. It is instead an accessible reference offering considerations, talking points, approaches, and tools related to the stewardship of Indigenous material culture.

These guidelines are intended to address stewardship of *all* Indigenous cultural material and are not limited only to items subject to NAGPRA or archaeological material. They apply to the totality of institutional holdings, including teaching and educational collections. The general frameworks can be used when engaging with communities, building equitable relationships, awaiting repatriation, drafting collections policies and procedures, advocating with administration, or reflecting on and growing within your own practice.

Although the expertise and knowledge used to create the *ICC Guide* center around Native American collections, repatriation, and Tribal and Native Nation communities, the terms *Indigenous* and *community* are used intentionally, to be inclusive and broadly applicable across the museum field and political borders. When the guide explicitly intersects with NAGPRA, however, the associated legal terminology is utilized.

Repatriation is the priority of nearly all Indigenous communities. Therefore, repatriation under NAGPRA must be a component of your initial conversations with communities to ensure basic legal compliance and establish a baseline relationship.

Building relationships, updating exhibitions, and stewarding collections are important, but repatriation is priority. Wyandotte Nation, like many other Tribal Nations, believes that our ancestors are entitled to a restful afterlife and that cultural belongings must be cared for with specific cultural protocols. These are both possible when repatriation is a priority.

—Heather Miller (Wyandotte Nation), NAGPRA Coordinator at Wyandotte Nation

The considerations in the *ICC Guide* assume a baseline relationship between an institution and a community or communities. You are encouraged to take the steps to initiate a relationship in whatever ways feel natural and appropriate to you. Remember that a community may not feel comfortable answering your questions or sharing protocols until there is a foundation of trust within that relationship.

Managing Indigenous collections is a caretaking role, whether temporary, until they are returned home, or as an ongoing steward. The collections are vital parts of Tribal cultural heritage, often with a violent history of being ripped from Tribal lands and people without free, prior, and informed consent. Encountering them today as a Tribal citizen brings up mixed feelings of love and connection and pride, along with grief and anger. Working on collections with museums opens a portal to the past and invokes the spirit of the maker of the item. It's imperative to listen and be part of a reparative process to not inflict additional harm.

—Bonney Hartley (Mohican/Munsee), Tribal Historic Preservation Manager at Stockbridge-Munsee Community

Federal Laws to Consider

The *ICC Guide* can supplement, support, and inform compliance with state, federal, and international laws that apply to the stewardship of Indigenous materials. The federal laws listed below apply to interactions with federally recognized Tribes and Native Hawaiian organizations.³

- Native American Graves Protection and Repatriation Act (NAGPRA), especially Duty of Care (43 CFR § 10.1(d))
- Curation of Federally Owned or Administered Archaeological Collections (36 CFR 79)

³ See also [US Laws Affecting Museum Collections](#) in the Appendix, as well as [ICC Guide & Duty of Care](#) in this Introduction.

- Archaeological Resources Protection Act (ARPA)
- Endangered Species Act (ESA)
- Bald and Golden Eagle Protection Act (BGEPA)
- Visual Artists Rights Act (VARA)
- Indian Arts and Crafts Act (IACA)
- National Historic Preservation Act (NHPA)
- American Indian Religious Freedom Act (AIRFA)
- Indian Self-Determination and Education Assistance Act (ISDEAA)

Care practices extend to exhibitions and public forms of display and narrative. Though tied to collections stewardship, the exhibition and interpretation of Indigenous cultural materials is outside the scope of this guide.

The approaches and practices outlined in the *ICC Guide* can be initiated on any level and become integrated into the foundation of the larger institution through policy language, staff training, and continuing education. In order to truly and meaningfully make a cultural shift within an institution, administrative leadership must support, respect, and drive these efforts. Staff and administrators should not be intimidated or expect perfection. Institutions can use the frameworks in this guide to begin to make changes by planning for a phased approach and incremental improvements.

You will likely be uncomfortable and challenged. You will likely make mistakes, as there is no “right” way to do this work, but each stumble is an opportunity to learn and grow. Centering culturally appropriate care is a field-wide shift, and *everyone* can be an integral part of it. The *ICC Guide* supports taking meaningful steps to incorporate the [Core Values](#) (outlined on pp. 16–17) into collections stewardship and advocate for institutional investment.

ICC Guide & Duty of Care

How the *Indigenous Collections Care Guide* (ICC Guide) complements and extends beyond NAGPRA's Duty of Care:

	NAGPRA'S DUTY OF CARE	+ ICC GUIDE
Applies to	Indian Tribe or Native Hawaiian organization	All Indigenous communities, including federally and non-federally recognized Tribes as well as communities beyond the United States
What is covered?	Ancestral remains and cultural items as defined by NAGPRA	All Indigenous collections as well as associated documentation and photographs
Consent required for	Exhibition of, access to, and research on	Online collections, publications, catalog records, documentation, and images
Stewardship	Appropriate storage, treatment, or handling	Risk management, shared stewardship, cataloging language and care of associated documentation, reproductions and imitations, and facility moves and renovations
Traditional Knowledge	Reasonable and good faith effort to incorporate this into stewardship of materials subject to NAGPRA	Incorporation of this in the care of spaces, people, and all collections
Advocacy	Legal requirements and compliance	Calls to action for accountability, sustainability, and funding

Consultation is the foundation of all activities in NAGPRA's Duty of Care and the *ICC Guide*.

Core Values

As the *ICC Guide* was being developed, key themes and concepts occurred repeatedly during working group conversations, and these values and ethics set the framework and foundation for how to think about collections care and access. Every section in the *ICC Guide* helps you apply these values and ethics to the specific collections stewardship topic under discussion.

Seek Pathways to Healing

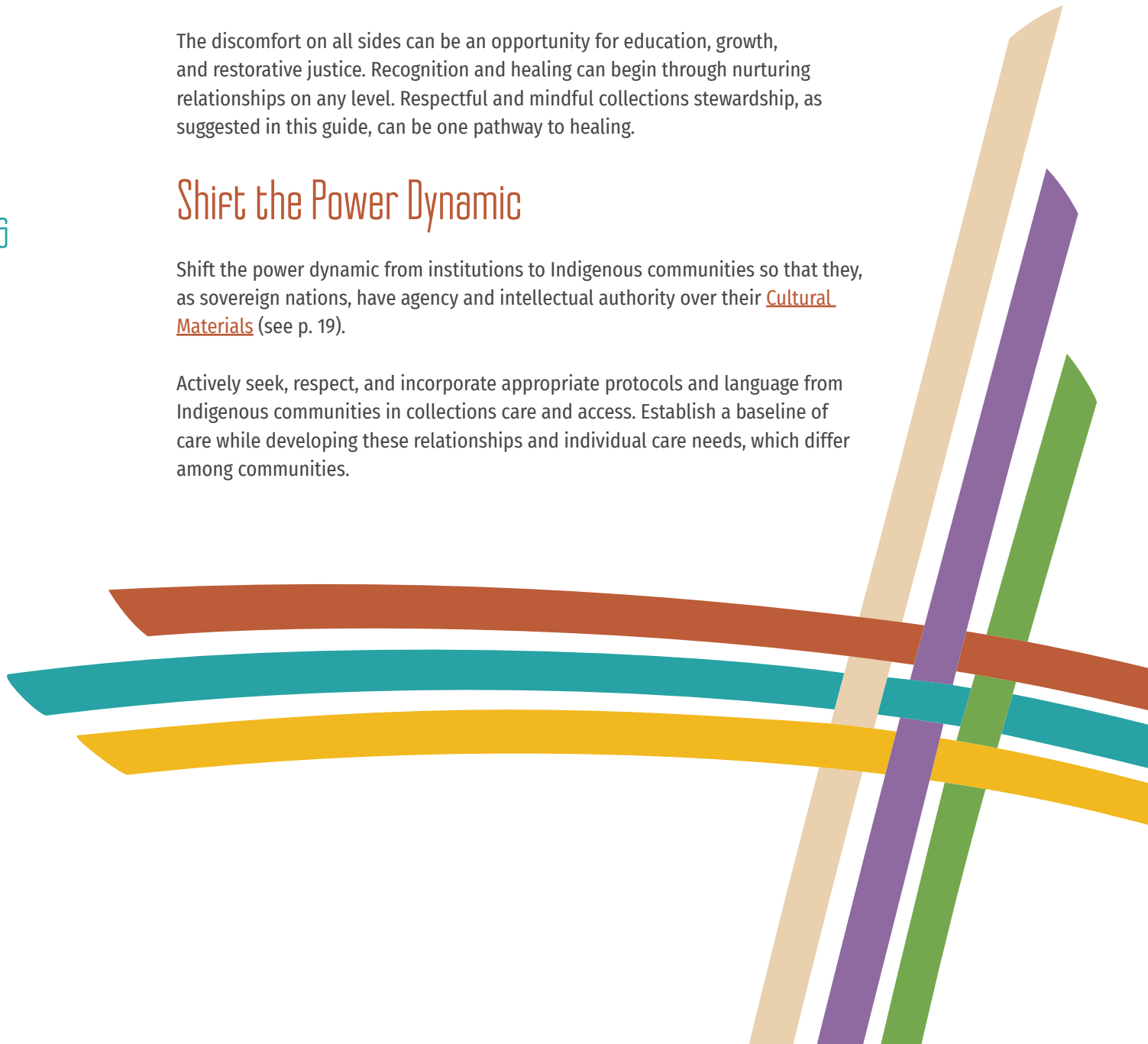
Seek pathways to healing through establishing trust and collaboratively developing new practices. Recognize and acknowledge the colonial systems that led to the acquisition of collections and the ongoing practices that continue to affect their access and care.

The discomfort on all sides can be an opportunity for education, growth, and restorative justice. Recognition and healing can begin through nurturing relationships on any level. Respectful and mindful collections stewardship, as suggested in this guide, can be one pathway to healing.

Shift the Power Dynamic

Shift the power dynamic from institutions to Indigenous communities so that they, as sovereign nations, have agency and intellectual authority over their [Cultural Materials](#) (see p. 19).

Actively seek, respect, and incorporate appropriate protocols and language from Indigenous communities in collections care and access. Establish a baseline of care while developing these relationships and individual care needs, which differ among communities.



Prioritize Indigenous Knowledge

Prioritize Indigenous knowledge and ways of knowing, and redefine the concept of “expert.” Acknowledge, invite, and welcome differences in perspectives, values, and frameworks. Understand and respect that knowledge and access are privileges, not rights, especially concerning [Culturally Sensitive Materials](#) (see p. 20).

Engage in Meaningful Consultation and Collaboration

Consultation is the first step to implementing any form of culturally appropriate care. Engage in meaningful consultation and collaboration with Indigenous communities in all aspects and phases of collections stewardship. Be transparent, open, educable, and adaptable.

Center Cultural Continuity

Many existing collections stewardship practices prioritize Western ways of knowing and caring for collections and items. Centering cultural continuity affirms the ongoing relationship cultural materials have with their communities.

Key Terms

These terms are essential to understanding the language used throughout the guide. Language varies, changes, and grows in perspectives and preferences, and terminology will fluctuate both among and within communities. It is essential, therefore, to be attuned to changes coming from Indigenous communities, and to remain flexible and open to this growth in the suggested language below.

A glossary was intentionally omitted from the *ICC Guide*, because it is not realistic to expect to use universal and standardized terminologies when engaging with a variety of individuals, cultures, regions, and situations. Focus instead on establishing shared terminologies with each community.

Glossaries are available in other resources. SAR's [*Standards for Museums with Native American Collections*](#) (SMNAC), for example, includes a glossary, as does its [*Guidelines for Collaboration*](#).

Collaboration

Collaboration is a shared decision-making and action-oriented process realized through partnerships between institutions and Indigenous communities. For a comprehensive description, see SAR's [*Guidelines for Collaboration*](#).

Collections Review

A collections review is a systematic review of an entire collection (or chosen materials) and associated documentation by an affiliated Indigenous community. A collections review process can build strong partnerships between an institution and a community via open communication, collaboration, and reciprocity.⁴

Outcomes of a collections review may include the following:

- the return of cultural materials
- the identification of cultural affiliations and makers
- the identification of culturally sensitive materials not already known to staff
- the establishment of guidelines that will inform staff regarding appropriate access, care, and handling protocols
- the addition of appropriate and approved contextual information to the records
- the addition of preferred Indigenous language, knowledge, and terms
- the correction of inaccuracies in the records

⁴ See, for example, Laura Elliff Cruz's "[*Indian Arts Research Center Collections Review with the Pueblo of Zuni*](#)" under Case Studies, this volume.

Indigenous Community

“The terms ‘community’ and ‘community members’ refer to tribes and tribal members, as well as Native American corporations or communities seeking to collaborate with a museum.” This is the definition for “Indigenous community” used in SAR’s [Guidelines for Collaboration](#), and the definition we are using here.

In accordance with legal terminology, the terms *Tribe* and *Tribal* are used when referring to NAGPRA.

Cultural Materials

Cultural materials⁵ are materials in a museum collection that may hold cultural significance to an Indigenous individual or community, and may be directly connected to ancestral heritage, family, cultural traditions, and/or spirituality. These may be considered living or imbued with spirit and therefore require culturally appropriate care.

Instead of ...	Consider ...
artifact/object	cultural material, cultural heritage
ceremonial object	cultural item, sacred item
grave goods	belongings
human remains	ancestral remains/ancestors, beings, relatives
bones	remains, elements

Language and word preferences are fluid and vary by community. Practice active listening for a community’s preference during the conversation and make shifts as appropriate. When in doubt, respectfully ask the community for their preference in terminology.

5 The definition of *cultural materials* differs from that of *cultural items* in NAGPRA (43 CFR § 10.2): “*Cultural items* means a funerary object, sacred object, or object of cultural patrimony according to the Native American traditional knowledge of a lineal descendant, Indian Tribe, or Native Hawaiian organization.”

Culturally Sensitive Materials

The term *culturally sensitive* is often applied by and used within an institution after consultation with a community, and it signifies that cultural materials may require specific care, treatment, and protocols. Note that Indigenous community members may use different terminology, including *sacred* or *ceremonial*.

Culturally sensitive materials are not limited to cultural materials as defined in the previous paragraphs; they may include any related or adjacent components, such as documentation, data sets, images, soil samples, or housing materials and supplies. These components may require repatriation, or they may also need to have specific care, treatment, and protocols, as defined within their community.

Institutions should understand that the reasoning or context for calling something *culturally sensitive* may not be appropriate to share, and respect the privacy of the community.

Many culturally sensitive materials are also subject to NAGPRA and should go through the legal process.

Terms Respecting Tribal Sovereignty

Terminology is an important way to respect, support, and identify Native American Tribes as sovereign nations. Tribal sovereignty is based on the notion of self-governance and independent nations. When known and appropriate, use the name of a Tribe, Nation, or community, including individual identities, such as one's clan or family names.⁶

As language continues to grow and shift, the terms used throughout the *ICC Guide* may become dated. Follow the guidance of the community on preferred terminology.

Remember, many communities may also use terms in their own Indigenous languages.

Group identity terms may include: Aboriginal, Alaska Native, American Indian, Community, Descendant Community, First Nation, Hui, Indian, Indigenous, Indigenous Peoples, Nation, Native American, Native Community, Native Hawaiian, Native Nation, Originating Community, Source Community, Tribal Government, Tribe

Leadership roles may include: Chairperson, Chief, Clan Leader, Clan Mother, Governor, Historic Preservation Director, Kahu, Kumu, Lieutenant Governor, Po'okela, President, Sakom, Spokesperson, Tribal Council, Tribal Historic Preservation Officer (THPO)

Individual identity terms may include: Artist, Community Member, Cultural Leader, Cultural Practitioner, Culture/Knowledge Bearer, Elder, Enrolled Member, Knowledge Keeper, Spiritual Leader, Treaty Beneficiary, Tribal Citizen, Tribal Member, Tribal Official, Two-Spirited, Youth

⁶ Gregory Younging, *Elements of Indigenous Style: A Guide for Writing By and About Indigenous Peoples*, 2nd ed. (Birchbark Books, 2025).

Sections

Section 1

Relationship Building



24

Positive, long-standing relationships grow from meaningful consultation, open communication, and respectful interactions. Building relationships is *vital* to centering culturally appropriate care.⁷ Note that there is no “right” way to consult with Native Nations and Indigenous communities, but there are common mistakes and cultural faux pas that you can avoid. Consult this section when preparing for and engaging in consultations with communities.

⁷ SAR’s [Guidelines for Collaboration](#) provides more details and examples of the relationship elements described in this section.

What Is Consultation?⁸

The definition of *consultation* under the Native American Graves Protection and Repatriation Act (NAGPRA) is “the exchange of information, open discussion, and joint deliberations made between all parties in good faith and in order to: (1) seek, discuss, and consider the views of all parties; (2) strive for consensus, agreement, or mutually acceptable alternatives; and (3) enable meaningful consideration of the Native American traditional knowledge of lineal descendants, Indian Tribes, and Native Hawaiian Organizations” (43 CFR § 10.2).

Consultation can be the framework not just for NAGPRA but for the stewardship of all Indigenous cultural materials. **Meaningful consultation** is not merely checking a box; it is action-focused, relationship-centric, and outcome-driven. It is built around active participation on all sides of the conversation.

Each Nation or community may approach and define consultation differently, with varying timelines and availability. Engage in conversations around expectations, hosting location, and the structure of the visit prior to consultation to ensure that the meeting is effective, productive, and respectful.⁹ Some recommendations for consultation best practices are on the pages that follow.

8 The material in the “What Is Consultation” section was developed and drafted with Chance Ward (Lakota—Cheyenne River Sioux Tribe), NAGPRA Coordinator at History Colorado.

9 See, for example, Laura Elliff Cruz’s “[Indian Arts Research Center Collections Review with the Pueblo of Zuni](#)” under Case Studies, this volume.

What to Do During Consultation

- Be respectful.
- Take time to learn about the community with which you are consulting. (For example, where is the community located? Is the current location also their ancestral homelands? What language do they speak?)
- Find out what positive things their community is known for.
- Meet with the appropriate, designated representative of the Native Nation.
- Be flexible and understand that schedules may change.
- Be a good host (for more, see [Hosting](#), pg. 28).
- Ask people if they want to offer a prayer to start the conversation.
- Offer privacy if people would like to smudge or give a blessing or prayer.
- Be up-front about who is involved in the consultation and who has decision-making authority.
- Provide transportation to and from the meeting location. (Note that Lyft and Uber probably aren't available on the reservation and Elders may be overwhelmed at the idea of downloading an app and making a profile.)
- Reserve parking spots, if appropriate, to ensure easy access to the building.
- Make time for casual conversation outside the business portion of the consultation. Get to know representatives and Elders as individuals—ask about families, hobbies, and so on.
- Be an attentive listener. A response is not always necessary.
- Be conscious of language choices and ask which terminology is most appropriate and preferred.
- Make time for breaks and always provide comfortable seating options.
- Provide food (such as snacks) and beverages, and consider cultural differences in food choices. Avoid having only sugary snacks.
- Escort people through buildings before meetings and to the exits afterward to make sure they can find their way around.
- Try your best to have honoraria ready for representatives and Elders when they come to visit instead of making them wait for a check.
- Consult in the concept stage of a project rather than after decisions have been made, and build authentic partnerships.
- Be honest. If you don't know an answer, don't pretend you do. Get the answer as promptly as you can.
- Be ready and willing to apologize for things that aren't your fault. Take accountability for your institution's mistakes, both past and present.

What Not to Do During Consultation

- Do not demand a response or participation within a short time frame.
- Do not make decisions after talking only with a citizen of the Nation rather than the appointed representative.
- Do not assume you know better or are the expert in the room.
- Do not use offensive language or terminology.
- Do not ask the community what they are saying if they choose to speak in their Native language in front of you.
- Do not push your agendas over theirs.
- Do not assume you know which terminology is best (for example, referring to an archaeological site as “ruins”).
- Do not mention your Native American ancestry DNA test results unless you are a member or citizen of a Tribe with living relationships to that community.
- Do not openly contradict an Elder or community representative.
- Do not press for information about ceremonies, traditional techniques, sacred sites, religious beliefs, spiritual practices, burial process, or cultural knowledge.
- Do not interrupt anyone, especially an Elder.
- Do not become defensive or make excuses for past mistakes.
- Do not take photos or other recordings during consultation or use the consultation as publicity or a media opportunity.
- Do not assume that agreements or consent given to a previous project will extend to the next one.
- Do not ask for approval or input *after* the big decisions have been made.



Hosting

A good host will be respectful, considerate, patient, and supportive of their visitors' needs. Being a good host is often underestimated. You can destroy a relationship before it begins by being a bad host. If you are unsure about something, ask the community prior to the visit.

Financial Considerations

- Be aware of the potential financial burden associated with a visit. Covering travel-related expenses and other needs for representatives can alleviate these burdens.
- Consider giving representatives honoraria, stipends, or other forms of recompense such as gift cards to recognize their expertise and compensate them for their time (see [Section 20, Accountability and Advocacy](#)). Ask for the preferred form of compensation.
- Pay for or reimburse parking if necessary.

Cultural Protocols

- Address any special care needs that may require advance planning (see [Section 8, Cultural Care of Items and Spaces](#), as well as Section 10, Risk Management: [Access Monitoring and Accountability](#)).
- Be aware that there may be protocols associated with the opening and the conclusion of an interaction.
- Make space for any cultural protocols, including prayers, offerings, or time alone with an item (see [Section 8, Cultural Care of Items and Spaces](#), as well as Section 10, Risk Management: [Access Monitoring and Accountability](#)).
- Offer opportunities for private conversations and space.
- Consider giving a gift, preferably locally based, to visiting representatives, and be prepared to possibly receive a gift as well.

Accessibility and Logistics

- Plan for food during the visit (breakfast, lunch, coffee breaks). Be aware of any dietary restrictions or needs of your visitors.
- Always provide the agenda in advance, and incorporate feedback. Ensure flexibility and extra time for activities.
- Let visitors know in advance who will be in the room at the institution, as well as their association with and role in the conversation.
- Provide directions and a map that clearly marks parking, building entrances, and so on. Coordinate transportation from distant parking areas if appropriate.
- Meet guests as they are arriving and help guide and orient them.
- Let visitors know the location of the consultation room and its proximity to other spaces, as well as the items that will be present and/or seen during consultation.
- Ensure accommodations, such as Americans with Disabilities Act (ADA) compliance, are made for community visitors.
- Make any necessary accommodations for Elders and their caregivers.

Internal Planning

- Prepare thoroughly for the meeting. Share inclusive lists and information about any potential items of interest in advance. Be transparent.
- Do not control the parameters of the visit or the participant list.
- Value the confidentiality of conversations and shared information.
- Invite relevant decision-makers to be present in the conversation.
- Make clear the institutional resources that can be engaged in a current or future visit.
- Add flexibility and transparency to your institutional policy and procedures related to receiving and giving gifts to allow for this cultural exchange as appropriate.

Communication

First impressions are lasting. Direct, open, and transparent communication is essential to building strong relationships. Focus on mindful language, active listening, trust, and empathy to affirm the humanity of everyone around the table.

Approach

- Be flexible with timelines and/or deadlines.
- Do not expect answers or decisions in the moment.
- Consider how a museum can support a community's priorities.
- Ask before you make assumptions.
- Be mindful that written communication, including emails, texts, and messages, can be subject to public disclosure under the Freedom of Information Act (FOIA).
- Be transparent about the types of communication as well as the content. For example, will sensitive information be shared in ways that the public might be able to access?

Language Choices

- Be conscious and respectful of the terminology and vocabulary you use. Take the community's lead on language choices.
- Avoid possessive and paternalistic language like "my" or "our" collections.
- Be attentive to visitors' reactions to your actions and language.
- If you are unsure how to pronounce a name or term, ask.
- Avoid angry and defensive language and behavior.



Call to Action: If you are facing barriers within the institution about implementing culturally appropriate care protocols, be forthcoming about it with the community. Invite communities to be advocates on their own terms.

Section 2

Decision-Makers and Points of Contact

It is essential to identify a designated representative of a community or institution. This person may have the authority to make decisions themselves, or they may be the point of contact who connects or liaises with appropriate decision-makers and facilitates the process. **Pathways and individuals may differ depending upon the need and type of request.** If you aren't sure where to start, reach out to the community or institution through its main phone number or general email and ask to be directed.

In some situations, institutions will need to consider multiple decision-makers within a community or across several communities. Take time to ensure that everyone is heard and included in the decision-making processes.

Identifying a Point of Contact Within an Indigenous Community

Each community has designated representatives who act as points of contact for collections-related inquiries, and some of these people may have multiple roles and responsibilities in their community. Go through the proper channels. Often, many individuals and steps are involved in the decision-making process. Changes in government and leadership may also alter the process and the people involved.

Common Indigenous Points of Contact:

cultural center, cultural leader, cultural preservation director or manager, culture committee, Elder, language program, NAGPRA Coordinator/ Representative, religious leader, Tribal archaeologist, Tribal Historic Preservation Officer (THPO), Tribal leader, Tribal museum, Tribal public relations office



Things to Consider

- Alaska Native Corporations (ANCs) and Native Hawaiian Organizations (NHOs) may represent multiple communities, but not necessarily all communities with cultural or ancestral ties. ANCs, in particular, are for-profit entities responsible to shareholders for land and financial matters—not governments representing cultural authority.
- Do not rely on ANCs and NHOs alone; consult directly with appropriate Tribal governments, culture bearers, and community representatives.

Identifying a Point of Contact Within a Museum or Institution

The point of contact may also be the decision-maker, the active steward of the collection, and/or the liaison for both. The process will vary greatly depending on the size and scope of the museum or institution.

Common Museum or Institution Points of Contact:

collections manager, curator, director, NAGPRA coordinator, registrar, Tribal liaison, Tribal relations officer



Call to Action: If at first you don't succeed, try and try again! Follow up an email with a phone call or letter, and vice versa. If you don't hear back within a few weeks or months, don't be discouraged: Check in again, or find another possible contact. Points of contact often have multiple roles, responsibilities, and priorities, and seasonal and ceremonial calendars may dictate availability. A lack of response does not always indicate a lack of interest!



Section 3

Indigenous Community Engagement with Collections

During a consultation visit, the Tribal representative, also a religious leader in his community, picked up a rattle we were talking about and began to shake the rattle and sing. It was beautiful. The experience was meaningful and moving to everyone present.

—Laura Bryant, Director of Repatriation at Gilcrease Museum

Indigenous communities have the right and authority to engage with collections as they deem appropriate. Engagement centers cultural continuity over static preservation and can be a catalyst that awakens stories, memories, connections, and strong emotions. It affirms and supports sovereignty and reclamation efforts. It can be a key pathway to healing.

Engagement can take many forms, including playing an instrument, wearing an item, dancing with an item, being in its presence, or caring for an item (such as with offerings or feedings). (For more on this, see [Section 8, Cultural Care of Items and Spaces](#).)



Call to Action: Develop internal policies or procedures to embrace community engagement with collections, including training expectations for all staff. Hold your institution accountable even though staff or the administrative structure may change.



Things to Consider

- Engagement can be planned or spontaneous, so flexibility is critical.
- Can your institution accommodate cultural use loans? (See Section 15, Loans: [Community Cultural Use Loans and Loans to Communities](#).)
- Communicate an item's condition and the presence of any known hazardous substances (see Section 10, Risk Management: [Chemical Treatments](#)). Discuss safety recommendations, including how to safely handle an item without gloves, if that is possible and desired.
- Grant community members privacy with cultural material, if requested. If you must remain in the space, consider using noise-canceling headphones, or moving to an area out of the line of sight.
- Engagement may require notifying other institutional staff, such as security or facilities. Share information as appropriate.
- Physical modifications of a cultural material, such as the addition of a feather or the loss of a bead, may occur during engagement. This can be understood as part of the life cycle of the item. Added components should remain untouched, unless the community requests otherwise. Make note of physical changes in the item records as appropriate.
- Ask the community if any handling, housing, or access protocols should shift after engagement. Be prepared to follow through with these changes and provide assurances and procedures that will be adhered to regardless of staff turnover.

IARC [Indian Arts Research Center] understands that cultural use may result in damage or change to the physical condition of the object. It is the policy of the IARC that the value of cultural use outweighs the risk of physical change inherent in such use.

—School for Advanced Research, Indian Arts Research Center,
Collections Management Policy, Cultural Use Loan section, p. 18

Section 4

Formalizing Shared Stewardship

Shared stewardship acknowledges the responsibility and expertise of communities and museums to collaboratively care for cultural materials in ways that respect and privilege cultural care. Formalizing or codifying this relationship can ensure consistency by mitigating the effects of institutional or staff changes. This approach can be used in various circumstances, including for repatriated items in long-term care or awaiting return.

Shared stewardship can be memorialized in a written agreement. Those agreements can be a legally binding contract, such as documents accompanying a loan from the community, or a nonbinding mutual agreement, such as a Memorandum of Understanding (MOU). Work with the community, and involve legal counsel as appropriate, to identify the format and conditions that are right for the situation. When creating an agreement, provide ample time for review and the acquisition of signatures.

At San Bernardino County Museum, we have developed what we refer to as a “third-place” model, where the museum serves as a trusted, temporary holding space for ancestors and cultural belongings in partnership with Tribes. Through established relationships, Tribes may choose to place ancestors or items with us until burial locations or long-term plans can be secured, allowing repatriation to move forward without delay while still honoring cultural protocols. In many cases, we use a shared stewardship agreement (a modified loan document) that transfers legal ownership to the Tribe while maintaining physical custody at the museum. This approach has also supported the care of ancestors and cultural items when immediate return is not feasible, when holding institutions are unsafe, or when access and transfer from those institutions is logistically difficult, particularly as repatriation work expands. Our role is not to retain control, but to provide a stable, respectful space defined by Tribal needs and direction.

—Tamara Serrao-Leiva, Deputy Director at the San Bernardino County Museum

Section 5

Facilitating Access

Indigenous communities have a right to access their cultural material.

Without thorough consultation, museums are often unaware of cultural items in the collection that are subject to NAGPRA. In recognition of that reality, consider restricting access to all Indigenous material culture until the appropriate decision-maker can be consulted (for more, see [Section 2, Decision-Makers and Points of Contact](#)). A collections review can be a powerful tool to understand which portions of a collection may be culturally sensitive.¹⁰ At minimum, institutions must comply with NAGPRA's Duty of Care (43 CFR § 10.1(d)) and restrict access to all ancestral remains and items subject to NAGPRA.

Always ask the Indigenous community for restrictions or access protocols related to any documentation associated with cultural materials (for more, see [Section 11, Catalog Records and Databases](#)). Decision-making may involve internal discussions with Elders. Give space and time for this guidance and discuss any interim preferences.

Keep in mind that these shared protocols for access to items and their documentation may affect access for institutional staff, researchers, the public, and other Indigenous community members.

Cultural material may originate from a community that is not a federally recognized Nation or may be associated with an unrecognized or international community. Determine who should be a part of access conversations based on the material in the collection and the geography of the institution.

An institution's collection, administrative structure, mission, priorities, and commitments impact the philosophy and practical applications regarding collections access. Be conscious of competing concerns and tangled lines of authority within institutions that may influence decision-making and opportunities.

¹⁰ See, for example, Laura Elliff Cruz's "[Indian Arts Research Center Collections Review with the Pueblo of Zuni](#)" under Case Studies, this volume.

Disagreements and Conflict

A museum must also be prepared to address and create space for the possibility that multiple communities may have cultural affinity to an item, and that equal access must be provided to all communities. Engage in a robust consultation or collections review process with all interested parties, be transparent about who is involved, keep everyone informed throughout the process, and give them time to make decisions among themselves.



Call to Action: Don't assume conflict. People are human and will have different opinions, but conflict is not as common as you might think. Don't let a fear of conflict hold you back.



Things to Consider

Everyone handles conflict, or perceived conflict, differently. If conflict arises, move forward as productively as possible.

- Keep in mind that there is no clear or easy resolution when different communities disagree on protocols or access.
- Provide opportunities for small group or one-on-one conversations.
- Discuss and establish clear goals for both your institution and the communities.
- Share information with all parties, and be as transparent as possible.
- Offer opportunities for consensus.
- Explore whether the protocols for one group would invalidate or violate another community's wishes.
- Refrain from active participation and allow communities to engage directly with each other.
- Focus on what *you* can do and what *you* can control in this situation.
- Follow procedures in NAGPRA's Duty of Care provision, if applicable.
- Understand when the situation needs you to just step back and wait for a more appropriate time.
- If the conflict remains unresolved, consider contracting with a third-party mediator who understands and respects community ethics and protocols. If possible, contract with an Indigenous mediator.

Conflict comes in many forms but is nothing to be afraid of.

—Dominic Henry (Diné), High Plains Group Tribal Liaison at the National Park Service

Section 6

Ethical Research



38

Scholars conducting research on cultural materials or ancestral human remains have rarely respected and incorporated Indigenous communities' perspectives, expertise, and protocols. **These materials are the cultural history of Indigenous communities.** Neglecting Tribal sovereignty over cultural materials perpetuates trauma to their communities.

Restrict—with exception for free, prior, and informed consent from the affiliated Tribe(s)—all access to and research on known cultural items and ancestral remains, as required by NAGPRA (43 CFR § 10.1(d)(3)).

Research on other cultural materials should be guided by consultation with the associated community and its preferences. Invite Indigenous communities or lineal descendants to control access to, research on, and image use of their cultural materials and related information such as site records and notes, images, collector

or contextual notes, and descriptions. Collaboration among the requestor, the institution, and the community on a project's goals and interpretation is beneficial for everyone involved.¹¹

This approach may feel aspirational, and it does have its challenges; however, the perception that something is impracticable cannot be a barrier. Instead, advocate for and build capacity toward this goal.

Institutions should craft policies and procedures regarding research that both anticipate and support conversations among the requester, institution, and affiliated community prior to access. Consider collections research as equal to research on living people, which requires the involvement of Institutional Review Boards (IRBs).

All research requests—including those by internal staff, community members, students, artists, and scholars, among others—should move through similar internal processes of approval, with priority given to affiliated community members. However, procedures for requests for access should not become barriers to community members. Respect the various responsibilities and expectations of both the communities and the institutions, as these may impact the ability to respond to inquiries.



Call to Action: Waive any fees associated with image use or reproduction for Indigenous communities.

When researchers are making a request, encourage them to think carefully about and document all possible uses of collections, such as publications or presentations. Additional and/or unrelated projects may be considered new or modified requests.

Internally document and archive all requests, decisions, permissions, and research conducted.

¹¹ For a real-world example, see [“Building Research Relationships with Contemporary Native Nations”](#) under Case Studies, this volume, in which Aimée E. Carbaugh describes her dissertation project on Illinois Mound groups.

WHO REQUESTS ACCESS?	WHAT IS THE PURPOSE OF THE REQUEST?
Academics and other scholars, artists, community members, curators, enthusiasts, faculty, independent researchers, institutions, internal staff, journalists, members of the public, NAGPRA staff, private collectors, students	Academic (thesis or dissertation development), artistic inspiration and techniques, contextual information, genealogical, image reproduction, object-based learning, provenance information, publication, scientific analysis, student interaction or research

Clearly articulate your expectations to all researchers about timelines, protocols, and behavior when they are interacting with collections. Be transparent with them about internal processes and decision-making. Build similar language and requirements into policies and procedures that will hold an institution accountable and give staff members administrative support when responding to requests. Some topics and situations to consider when crafting access and research policies and procedures are on the pages that follow.

Artificial intelligence technology is shifting rapidly and becoming integrated into daily tasks and information consumption. Before embracing AI in research, pause to consider what information is shared through that medium and the implications of that choice.



Things to Consider before Requests Are Made

- Is there a clear understanding of which institution or agency has control (versus custody) of the material being requested and which party can approve requests?
- How would the designated community representative like to receive these requests?
 - Who should be the primary point of contact, the researcher or the institution?
 - How much communication does the community want?
 - What is the community's capacity to engage with these?
- Who approves access and research requests at the institution? And who approves these in the community?
 - What is the process for incorporating community response?
 - Do you prioritize approval from lineal descendants or approval from Tribal leadership?
 - Is there an established formal review process within the community?
 - Is the institution's review and approval process clearly laid out for the researcher?
- For both communities and institutions: How long does the approval/denial process usually take? Is there a periodic review of access and research requests?
- How do you manage the data researchers have already received from the institution? Does the researcher need to submit a new request for shifts in the purpose or use of a collection they previously accessed?
- Craft a statement for researchers to sign acknowledging that they understand the terms of access.
 - Institutions and communities could consider having researchers sign a contract.
 - How do you follow up to ensure the researcher has fulfilled their obligations as articulated within the research agreement?
- Are you prepared to say no? What are the internal implications of saying no? Is there a review process?



Things to Consider about Initial Requests for Access

- How will the research or access request benefit the Tribal communities?
- How will cultural protocols be communicated to the researcher? How is the researcher expected to conduct themselves in the presence of the collection?
- What forms, letters, and approvals are required by the researcher?
- Does your institution require communication logs or records with communities, letters of support (approvals, permissions, etc.), and so on? Does your institution's policy need a statement on informed consent?
 - Is there a different process for federally recognized Tribes versus state-recognized groups or communities?
 - Note: Written consent is required for access or research related to any items subject to NAGPRA (43 CFR § 10.1(d)).
- What, if any, level of Institutional Review Board (IRB) involvement is required for this research inquiry? Is there an IRB process at the originating institution (college or university)? Is there an IRB process at the affiliated Tribe or community?
- What do you do if the requested collection is not affiliated with a community or culture group?
- Consider the confidentiality of some types of information, especially site locations. Do you include language restricting any publication or sharing of sensitive data?



Things to Consider about Community Responses to Requests

- What is the process if the community representative does not respond?
- What is the process if the community representative says no?
- Do you need permission from all communities (multiple stakeholders) associated with a particular culture or item? Do you require majority approval, a consensus, or unanimity?
 - What if one community says yes and another community says no? Do you honor the majority?
 - If one community says no even if other communities say yes, is the answer still no? Does the negative answer carry more weight?
 - Do you require letters and/or responses from all communities, even if they say no? How do you ensure that the researcher is ethically and responsibly sharing written consent?
- The community may decide that they want to collaborate rather than consult.
- Consulting on the interpretation of the research data is also important: Access is not the only conversation.
- What happens if a research project begins with permission/approval under one administration, but leadership changes?
- What happens if a community citizen or lineal descendant requests access, but the community leadership has restricted the material?



Things to Consider after Access Has Been Given

- Are researchers required to share with the community and institution a final copy of the work, publication, presentation, and/or data that the research was used to create?
 - Should that work product be kept on file for future researchers and/or community access?
 - How are researchers held accountable for sharing their final product or research results?
 - How will the researcher be held accountable for their behavior and their commitments in the access request?
- How do you fold image requests into your research policy?
 - Where do these images live, and how can the researcher use them in the future?
 - Do you permit images of research or images taken by researchers to be posted on social media?



Call to Action: Foster a culture of accountability through your own engagement with communities in research, access, and curriculum development. Be a positive example for students, interns, and emerging professionals.

A graduate student researcher once mishandled material loaned to him for analysis. Destructive analysis was done beyond the scope of approval, and with a lack of communication and documentation. After the cultural material was returned, a strongly worded message was sent to that graduate student and their faculty advisor. The student was banned from access or research to the collection in the future. Details were also shared with the affiliated communities, and they were put in contact with the faculty advisor. It was a valuable learning experience for all involved.

—Marla Taylor, Curator of Collections at the Robert S. Peabody Institute of Archaeology



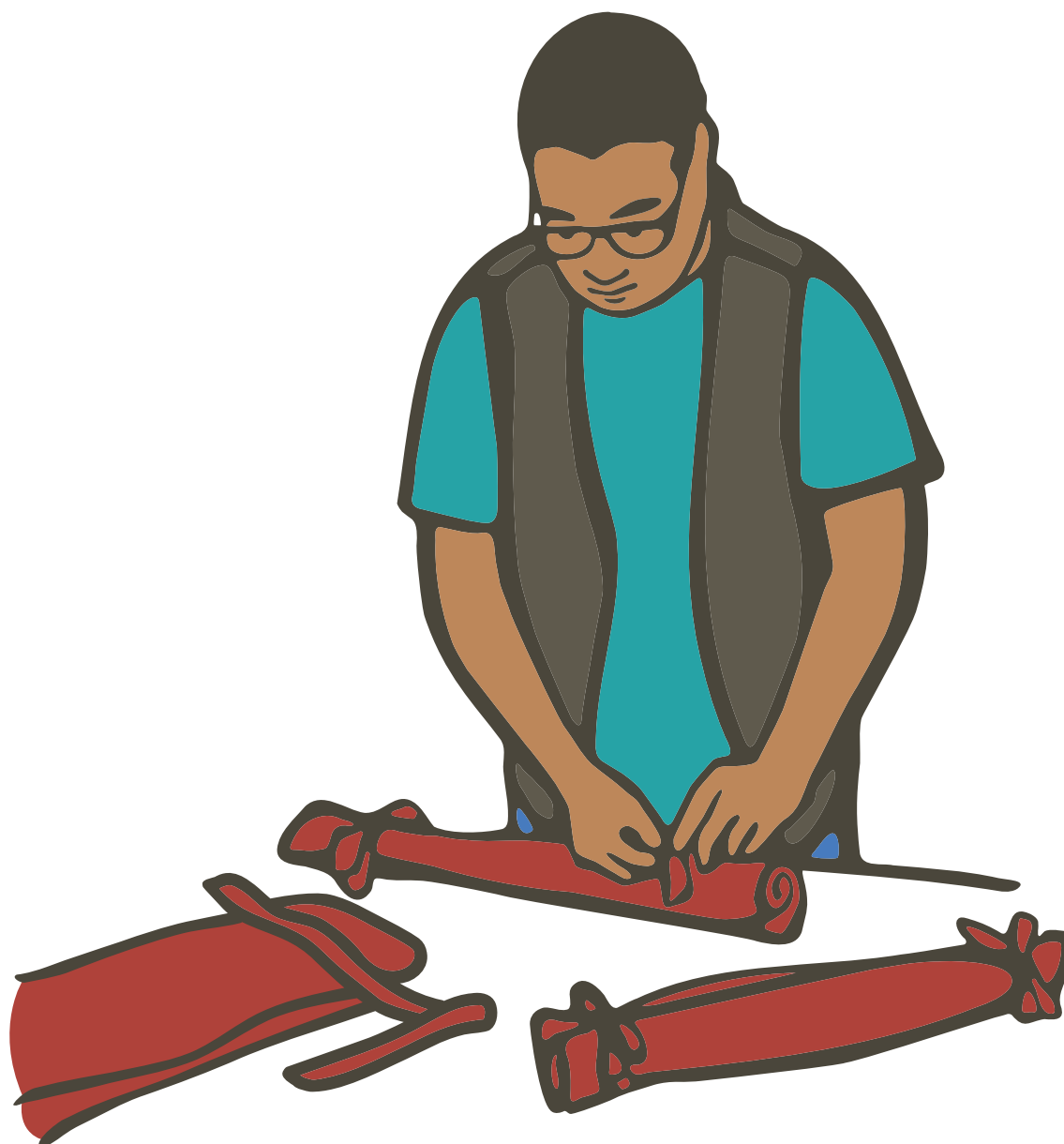
Call to Action: Craft policies and procedures prioritizing research requests that are beneficial to, supported by, and shared with the associated community.

Templates and Examples

Many Native Nations have developed their own research request forms and protocols. For some examples, see [Additional References](#): Forms and Templates in the Bibliography. There is also a [Sample Collections Access / Research Request Form](#) in the Appendix.

Section 7

Handling and Housing





Call to Action: Codify culturally appropriate care protocols into policy and procedure documents to ensure institutional accountability when community representatives are not present. Create a system to document follow-through and share that information with Indigenous communities.

Handling Protocols

Physical handling is a foundational practice of collections stewardship. Each Indigenous community may have its own standards and guidelines for who can handle or be in the presence of specific cultural materials and/or ancestral human remains. Integrating these standards may require additional planning, preparation, or special conditions when working with the collection.¹²



Things to Consider

- When cultural materials have gender restrictions, are there options if cultural protocols are not practicable given the gender of the institution's staff?
- Gender is a spectrum; therefore, different protocols may apply for materials with gender restrictions.
- Have options for Indigenous community members to handle cultural materials with or without gloves. Clearly communicate any safety concerns (for example, see Section 10, Risk Management: [Chemical Treatments](#)).
- Menstruation cycles and pregnancy may affect scheduling and time frames.
- Consumption or substance restrictions may affect handling or engagement.
- Some items may only be accessed around certain times of year.
- Offer the option for someone from the community to culturally care for the workspace before and/or after handling.

A Tribe asked me not to handle or engage with certain cultural materials during menstruation or within three days of consuming alcohol. This was for my own protection, as their beliefs were that my body would be weakened by those events and actions and they wanted to protect me.

—Marla Taylor, Curator of Collections at the Robert S. Peabody Institute of Archaeology

¹² The Local Contexts website has more information on developing [cultural care notices](#) (or Collections Care Notices) to communicate handling protocols in museums. Also see Emma Dixon's "[Collections Care Notices at the National Museum of the American Indian](#)" under Case Studies, this volume.

While caring for an item of cultural patrimony, I was advised by the affiliated Tribe not to handle the item while menstruating. The representative explained that this was because menstruation made women more powerful, and it was not safe to interact with the item during that time. This accommodation has been easy to incorporate and has not affected my ability to perform my job.

—Katelyn McMullin, Anthropology Collection Manager at the University of Nebraska State Museum

Rooms and Buildings

Museum staff should be mindful of an item's orientation within a room or facility, both directionally and spatially, as well as its proximity to other cultural materials or ancestors. For example, some items may need to face east, or be placed in a different room.



Things to Consider

- When separate spaces are not available, shelving or areas can be blocked or covered using plastic sheeting, heavy curtains, or unbleached muslin.
- Paint a small “N” on the north wall and/or an “S” on the south wall as a discreet way to easily locate the cardinal directions.
- Build a positive relationship with cultural materials by speaking to them about who you are and what you are doing in the space.
- If an individual item cannot be relocated, consult on options, including draping muslin over it or creating a custom container.
- Reorganize shelf contents to accommodate cultural materials that may need to be on a top shelf or a higher shelf.

It is important to respect the spiritual health of the people and cultural materials who enter and reside in these spaces. Spaces that house culturally sensitive materials or ancestors can require special cultural considerations. These may limit how a space is cared for or used, including restrictive access and privacy. (For more on these, see [Section 8, Cultural Care of Items and Spaces](#), as well as Section 10, Risk Management: [Access Monitoring and Accountability](#).)

The names of spaces within a facility set the tone for interaction. Be respectful in the naming of spaces, and avoid derogatory or culturally insensitive terms. Be mindful of this when fundraising and providing naming opportunities for spaces.

Instead of naming a collections housing area after a donor, consider phrasing such as “Collections Area, generously supported by XXX.”

Materials

Some standard museum archival housing materials and practices may be more appropriate than others for Indigenous ancestors and cultural materials in different contexts. Communicate all options to communities for respectful housing. Materials suggested by communities, even if not archival, should be accommodated where possible.

Pueblo of Zuni artist Chris Lewis beautifully wove this basketry ring from yucca fibers. Traditionally, basketry rings were used to support bowls of stew being transported on one's head, or for storing pottery, and they are still employed for these purposes today. For the *Grounded in Clay: The Spirit of Pueblo Pottery* traveling exhibition (2022–27; organized and developed by the School for Advanced Research and the Vilcek Foundation), numerous woven yucca rings were used to stabilize pottery during display, rather than traditional metal exhibition mounts. Using natural and breathable housing materials instead of museum-quality synthetic materials for pottery items connects historical practices to living knowledge and is another path forward for cultural care.

—Laura Elliff Cruz (Choctaw Nation of Oklahoma), Director of Collections at the Indian Arts Research Center, School for Advanced Research (SAR)



Things to Consider

Preferred materials may include:

- acid-free unbuffered tissue paper
- certain colors of cloth
- corrugated archival board
- cotton muslin bags (various sizes)
- cotton twill tape
- paper labels with cotton string ties
- tapa cloth (or other plant-based textiles)
- unbleached cotton muslin
- unmarked bankers boxes

Rehousing

The rehousing of any cultural material is a disturbance that may not be desired.

If possible, consult with the community before any rehousing projects.

When considering rehousing, understand that the original enclosures of culturally sensitive items and ancestors are often also culturally sensitive, and the community likely has protocols for what should be done with the original housing materials and spaces. Rehousing of material subject to NAGPRA must not be initiated without Tribal consent, per NAGPRA's Duty of Care (43 CFR § 10.1(d)).

If rehousing is necessary or requested in consultation, representatives should be invited to participate in the process either virtually or in person. If this is not possible, notify communities once rehousing is complete.



Labeling Practices

It's helpful to have cultural care protocol labels indicated in multiple places. For example, a sacred item is noted in my accession log by different colored ink; there is an indicator on the cabinet/shelf; and the database record indicates its culturally sensitive nature. That way, no matter which method we use to approach an item, we know that it is a sacred item.

—Amanda Lancaster, Curator of Collections at the Alutiiq Museum & Archaeological Repository

Item-identification labels and container labels establish the baseline of knowledge for all interactions with cultural material. The labels should also include appropriate spelling and terminology, including terms in the Indigenous language when possible.

Item Labels

Item identification numbers are essential for museums to be able to connect cultural materials and their associated documentation. What may be considered best labeling practices from a museum perspective, however, may be considered by an Indigenous community to be invasive, disrespectful, or harmful. Think about and accommodate alternative ways of labeling; for example, instead of adhering a number to an item directly, use a removable tag.

If you encounter legacy tags or labels that may be inappropriately attached or causing damage to an item, remove them if you can. However, if doing so would further damage or alter the item, discuss the process in consultation.

Container Labels

Containers and cultural materials with specific handling and access restrictions should be clearly labeled in an established and institutionally integrated system.¹³ This system could also be used to label shelving aisles and rooms holding sensitive items, or filing cabinets containing sensitive information or imagery.

These labeling modifications (and other handling and housing considerations discussed in this section) should be integrated into regular staff training as well as staff onboarding to avoid inconsistencies.

¹³ See Emma Dixon's "[Collections Care Notices at the National Museum of the American Indian](#)" under Case Studies, this volume.

Facility Projects and Collections Moves



Call to Action: Communities should be involved during all of the planning and implementation stages of a building project, regardless of the project's scale.

Museums may undergo renovations or construction projects that require packing, moving, or temporarily relocating the collection. Consultations about any facility projects should ideally be conducted with all communities represented in the collection. At a minimum, be transparent and regularly consult with the primary communities represented in the collection before a project begins.

Maintain established care protocols and develop a plan and procedures to minimize handling and movement. Be mindful that some cultural materials may have specific considerations related to relocation. Invite community representatives to be present or participate in the packing or moving process as appropriate.

Facility projects can also be an opportunity to reenvision, repurpose, or reorganize the collections and support spaces. For example, consider including separate rooms for sensitive collections or creating the infrastructure to allow smudging or other community-led care.

The need to relocate collections can be unexpected, sudden, and/or disaster-related (see Section 10, Risk Management: [Developing Emergency and Recovery Plans](#)). There is not always time to plan. Do your best to protect the collection and prioritize community needs and involvement. Always notify communities as promptly as possible.

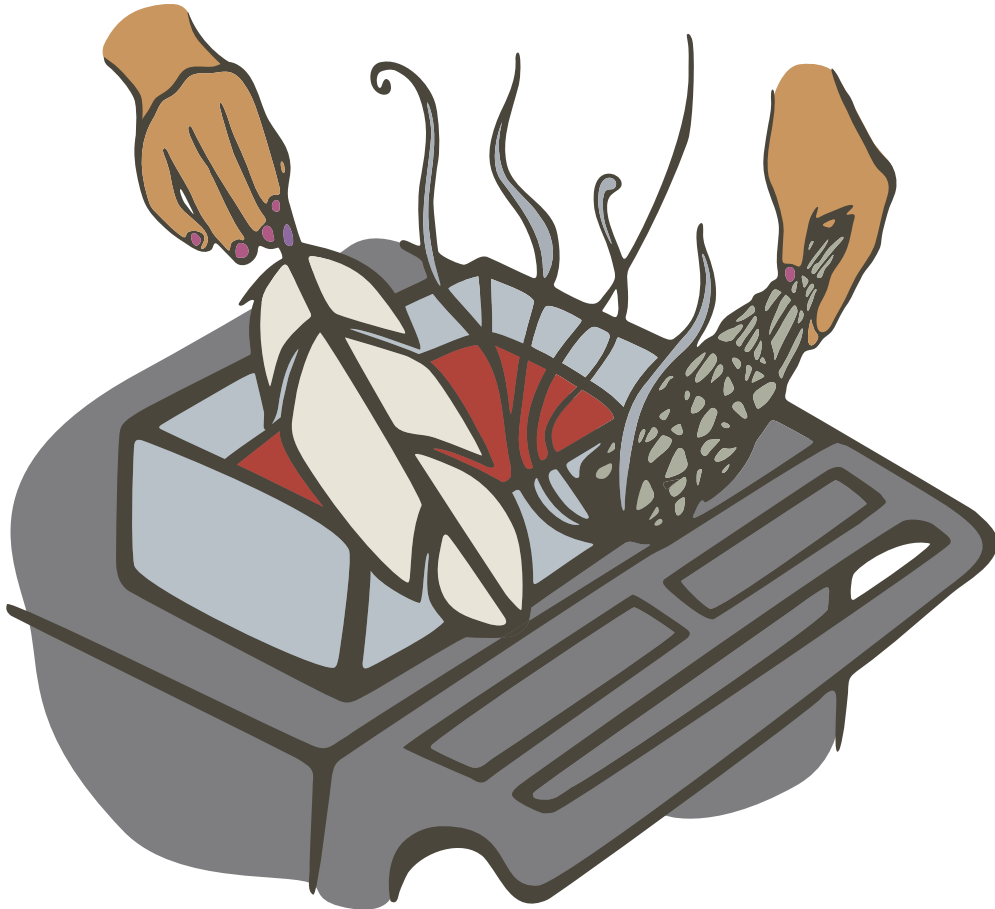


Things to Consider

- Prioritize repatriation before facility projects to minimize movement and handling.
- Who is the primary point of contact for coordinating communication and scheduling with relevant communities and internal staff?
- Who is moving the collection?
- Does your facility have any contractual requirements regarding who can and cannot move the collection?
- How much information do you share with move staff about what they are handling and moving?
- What is your budget for compensating community representatives who participate in or are present for portions of the move?
- How are staff or contractors trained about move procedures and cultural care protocols?
- How is training for move staff developed? Are communities involved in developing or approving this training?
- Can you accommodate privacy and security when certain collections are moved or communities are present?
- Are collections accessible to communities during the facility project? Under what circumstances?

Section 8

Cultural Care of Items and Spaces



52

Many Indigenous communities consider items to be animate, imbued with spirit, or alive. As such, they may require certain protocols, including offerings and feedings. Consult and collaborate with communities to determine protocol needs, their frequency, and the appropriate individual to conduct this task, whether a community member, lineal descendant, or museum staff. This includes the appropriate disposal of any offerings. Find a balance between abiding by these requests and mitigating and managing any potential risks such as pests, chemical contamination, damage because of the item's fragility, and security concerns.

Community-led care may include food, tobacco, natural light, dancing, air movement, soaking in water, the application of oils, time outdoors, and so on.

Purification and/or cleansing may be conducted by Indigenous community members or lineal descendants before, during, and after they interact with museum collections. Any introduction of liquids, fire, or smoke (through smudging or burning) in a museum setting requires proper planning and communication to ensure that safety protocols are followed.

It is important for our ancestors and their belongings to be cared for, talked to, and for those connections be felt reciprocally. Providing space for those requests and accommodations supports traditional knowledge holders and caretakers but also builds trust and relationships between institutions and Tribal communities.

—Rebecca Rupe (Grand Traverse Band Odawa), Archives/Collections Coordinator and NAGPRA Representative for the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians

Things to Consider

- Accommodate short-notice requests for cultural care visits from community members.
- For materials subject to NAGPRA, ensure any necessary approvals from designated representatives are in place.
- If the facility cannot accommodate a request, identify alternative approaches in consultation.
- Items can have individual and unique needs. Unless consent is given, cultural materials should only be cared for by their affiliated community or communities.
- Notify other institutional staff, such as security or facilities, when necessary.
- Ensure privacy is maintained during all activities, including having museum staff leave the room.
- This process should not be exploitive. Maintain discretion and respect.
- Track when cultural care is conducted and by whom, when appropriate.
- If community requests conflict with each other, communicate this transparently and give space for the communities to resolve it themselves (see also [Section 5, Facilitating Access](#)).

Section 9

Conservation

Conservation supports the preservation of what is valued about an item, including the tangible and intangible aspects of material culture.¹⁴

Understanding what is valued is only possible through consultation and collaboration with communities. Not all cultural materials should maintain a particular physical stasis in perpetuity; they should be allowed to continue their journey and degrade naturally.

Conservation decisions and actions should serve the priorities of the community and be informed by its knowledge, needs, and desires. Consultations provide an opportunity to understand degradation and deterioration as purposeful change. All conservation action should be done with the **informed consent** of the descendant community.

See the American Institute for Conservation's [Code of Ethics and Guidelines for Practice](#).

Examination and Assessment

Conservators look closely at cultural materials to understand what they are made from, how they are made, and their condition. The condition assessments, surveys, and other reports generated by conservators should be informed by engagement with communities, which can add Indigenous cultural context and function and help them understand materials and creation. All of this information should be used to inform decision-making, conservation action, and display.

A condition assessment may have different audiences, stakeholders, and purposes; therefore, it is important to understand the intention and purpose of any examination or assessment of cultural materials. Institutions should clearly and openly discuss the intent of conservation action with affiliated communities.

¹⁴ Conservation is an integral part of collections care on the macro level (preventive conservation) and the micro level (conservation treatments). For more on preventive conservation, see [Section 10, Risk Management](#).

Consider adding these questions to a standard internal condition report or assessment:

- What is the provenance of this item?
- What was the cultural function of this item in the community?
- When and how was this item used?
- Does its condition relate to its use? Is this visible in the structure or on the surface?
- How does the community view the life of this item within a museum?
- How does examination, analysis, or treatment work in service to the intentions of the descendant community?

If you need to assess items because of an emergency or imminent threat, respond according to your emergency protocols or do what is necessary for human or material safety (for more, see Section 10, Risk Management: [Developing Emergency and Recovery Plans](#)). Always communicate with Indigenous communities as promptly as possible.

Treatment

The American Institute for Conservation defines “treatment” as: “The deliberate alteration of the chemical and/or physical aspects of cultural property, aimed primarily at prolonging its existence. Treatment may consist of stabilization and/or restoration.”¹⁵

Make every attempt to obtain informed consent before any treatments on cultural materials, including cleaning. Consider involving artists or makers with cultural knowledge: They could provide critical insights that inform the conservation process, or they could better execute the treatment.¹⁶

Share any prior condition and treatment reports and proposals, documents, or other analyses—for example, pesticide testing—with communities (for more, see Section 10, Risk Management: [Chemical Treatments](#)).

Artists speak to the intent of their own work. If the cultural materials are associated with a living artist, consult with them first and ask if they would like to complete a repair or approve a treatment.

¹⁵ The definition is from the American Institute for Conservation’s [list of conservation terminology](#), available on its website.

¹⁶ For an example of conservation working with communities, see Elly Stewart Davis’s “[Traces of Life: Honoring Evidence of Use During Conservation](#)” under Case Studies, this volume.

Section 10

Risk Management

Integrated Pest Management

Pest infestations—both preventing and treating—are real and constant concerns for institutions. One of the best ways to mitigate pest activity is to regularly clean and monitor collections spaces. If there is an active pest infestation or damage to cultural materials, inform communities and work with them to develop treatment and mitigation plans.¹⁷

Some treatments for pests, including freezing or anoxic chambers, may be destructive to cultural materials in ways that staff will not be aware of without community consultation.

Some Indigenous communities may request that natural plant materials be used as pest deterrents. Work with them to determine safe and effective treatments and possible alternatives. If natural methods are used, be respectful of privacy and sensitive information, as not all knowledge should be shared.

Whenever cultural materials are returned to an institution—for example, after a loan or community engagement—identify an appropriate procedure with the community to mitigate potential pest introduction.



Chemical Treatments

Historically, collectors, dealers, museums, and others have applied chemicals such as pesticides and preservatives to ancestors and cultural materials, with the intention of preventing pest infestations and preserving, repairing, or stabilizing the cultural materials. Some of these chemicals, and even some original materials, are harmful to humans and may contaminate water and land. Even if the item itself wasn't treated, it may be affected by cross-contamination if it was housed in proximity to another item that contains harmful chemicals and metals, radiation, or mobile particulates.

17 For more on pest management, see Christa Deacy-Quinn, "[FUNDamentals of Museum IPM](#)" (Spurlock Museum of World Cultures, University of Illinois Urbana-Champaign, 2020) and [MuseumPests.net](#). Links can also be found in the [Additional References](#): Resources and Professional Development section of the Bibliography.



Institutions must be transparent, and they should proactively disclose any known applications or the existence of harmful chemicals on or near cultural materials. NAGPRA requires disclosure of known hazardous materials, pesticides, or inherent toxins before repatriation (43 CFR § 10.9(a)(1)(v) and § 10.10(a)(6)).

With guidance and instruction from trained professionals, institutions should test any cultural materials upon request and discuss safety protocols for all handling and physical proximity. This should be done in close consultation with the appropriate communities, especially if the community is planning to reintegrate the cultural material into regular use.¹⁸

If cultural materials or ancestors might be toxic, communicate clearly with Indigenous community members the recommended safety protocols for handling, housing, and accessing them.

¹⁸ See also Nancy Odegaard and Alyce Sadongei, *Old Poisons, New Problems: A Museum Resource for Managing Contaminated Cultural Materials* (AltaMira Press, 2005). (An updated version is forthcoming.) Also see the November 2024 webinar “Contamination and Pesticide Residues for Small and Mid-Sized Cultural Institutions,” on the Foundation for Advancement in Conservation website.

Things to Consider

- Create and share a summary of an institution's known pesticide history.
- Wear appropriate personal protective equipment (PPE).
- Regularly wash hands.
- Use respectful imagery in catalog records and on labels for housing containers. Although standard hazard symbols, such as the skull and crossbones, may be off-putting, these are used to indicate acute toxicity and potentially lethal risks to human health. Be transparent about the use of these symbols.
- When cultural protocols and needs diverge from safety standards, be flexible and offer alternatives.

Industrial hygienists are scientists and engineers committed to protecting the health and safety of people in the workplace and the community; they are part of a broader family of professionals often referred to collectively as occupational and environmental health and safety. Industrial hygienists can assist Indigenous communities with the evaluation of Indigenous collections for potential contamination so that community members do not suffer the effects of breathing, ingesting, or having skin contact with pesticides.

—Ralph A. Froehlich, Certified Industrial Hygienist at Helix Environmental, Inc.

Access Monitoring and Accountability

Institutions keep the building, staff, and collections protected and secure by monitoring spaces, activities, and people. Communities value and understand the need for the protection of their cultural materials, so be transparent and flexible with community representatives about these processes.

Things to Consider

- Who is authorized to access certain spaces within a facility?
- How is access in a facility tracked and monitored?
- Where are security cameras placed?
- Is a space being monitored by audio? If so, can it be temporarily disabled?
- What accommodations can be made for community members who need privacy with collections?
- What can be controlled if the institution does not own the space the collection occupies?

Developing Emergency and Recovery Plans

When planning for emergencies, institutions should consider and consult on the priorities of Indigenous communities, including guidance on the evacuation of cultural materials and which items are prioritized for first removal. Emergencies can be natural disasters such as floods, wildfires, and earthquakes, but they can also include facility malfunctions and the appearance of mold.

An emergency is an emergency. Some cultural protocols may be different in an emergency or recovery situation. Be transparent and forthcoming with communities about actions taken.



Things to Consider

- Preserving human life is always the first priority in any emergency.
- Even with the best-laid plans, emergencies require fast-paced decision-making.
- It may be impossible to observe handling protocols without risking damage. Consult on the community's preferences and establish levels of action.
- Emergencies are unpredictable. Promises cannot be made regarding the realities of evacuation, handling preferences, and so on.
- In the event of an emergency involving water, consider the impact of chemically treated items; also consider how building hazards may now impact the collection.
- Communities may need to care for cultural materials in a particular way after an emergency.
- After an emergency, communities may not want cultural materials to be salvaged, preferring that they deteriorate naturally.
- Materials may be damaged beyond repair. Consult with the community on disposal methods.

Consult with the community on cultural materials that are high priority for recovery or evacuation. Keep track of these items by noting the high-priority status in the accession log, in the database, in response kits, and by tagging the items' cabinet/shelf/drawer.

Local communities and cultural centers may be willing and able to house collections in an emergency evacuation. This relationship can be reciprocal: Institutions could perform this service for cultural centers as well. Establish these connections in advance.



Call to Action: Maintain updated contact information for key community partners in the institution's emergency plan. Inform these representatives of the situation as soon as possible.

Section 11

Catalog Records and Databases



60

Language Choices and Cataloging Standards

Naming is power.¹⁹ Standardized museum nomenclature systems, based in Western science and terminology, are not only often inaccurate but also inadequate to identify, label, and describe cultural materials.

Every community is different and has varying preferred languages, both for use in consultation and for describing, identifying, and interpreting their culture and belongings. Ask communities for their language and terminology preferences, and have them clarify how and where they would like an institution to incorporate them.²⁰

¹⁹ For more on the history of naming systems, see Hannah Turner, *Cataloguing Culture: Legacies of Colonialism in Museum Documentation* (University of Chicago Press, 2021), and Gregory Younging, *Elements of Indigenous Style: A Guide for Writing By and About Indigenous Peoples*, 2nd ed. (Birchbark Books, 2025).

²⁰ For terminology adjustments one institution made in consultation with communities, see the Arizona State Museum's "[Respectful Terminology Recommended for Discussion of Human Remains and Funerary Objects in Archaeological Compliance](#)" (Arizona State Museum, 2020).

Integrate Indigenous languages and terminology into institutional collections management systems, as appropriate.

Things to Consider

- Legacy language in catalog records can be hurtful and derogatory. Consider making conscientious adjustments to terminology.
- Use the Indigenous word for the item as the primary identifier and the museum nomenclature as the alternative.
- Consult with community language departments to ensure preferred spelling and context.
- Note that different dialects within the same Indigenous language may have alternate spellings for the same term.

 **Call to Action:** Encourage your collections management system software company to better serve Indigenous collections by allowing the use of special fonts or Unicode and adding appropriate fields.

NAGPRA representatives from federally recognized Tribes and Nations typically use the common and/or Indigenous names for the plants and animals they wish to repatriate. In academia, however, most scholars in the biological sciences rely on the scientific names of plant and animal species. Although they operate in good faith to fulfill the requests of the Tribes and Nations for information on collections and holdings, institutions may provide databases that exclusively use scientific names. Ensuring that the common names are also provided with plant and animal inventories can mitigate the need for clarification and avoid the delays that may occur when processing repatriation requests.

—Jesse Bergevin, Historian

Correcting and Augmenting Historical Data

Understand that provenance and other legacy information in records may not be accurate. It is essential to verify the community affiliations and identifications of cultural materials cited in museum records. This can be achieved through consultations and collections reviews.²¹ All changes should be reviewed and approved by the community. The community should also review which materials are appropriate for staff or public access.²²



Things to Consider

- How do you document both the historical inaccuracies and the corrections?
- How do you document the approval steps? Who reviewed the material, how was it reviewed, and when were changes approved?
- How do you document the source of corrections?
- Is the source speaking as a designated representative of the community's governance or as an individual?
- How do you document and handle any affirmations, variances, or disagreements among sources?

Internal Access to Records

Internal access to catalog records and associated information, whether those files are on paper or in a digital management system, is essential to completing daily collections stewardship and NAGPRA tasks. However, not all museum staff members or volunteers need the same types of access, because most do not need to interface with collections or database management on this level. This is true not only of item-level information but also the associated provenience, provenance, and archival documentation.

Clearly convey to the community who has internal access to these records, who participates in database management, and why.

To successfully implement and follow cultural protocols within collections care, instructions must be shared with relevant staff and may become part of the permanent item record. Use the internal database or catalog system to record any care needs or restrictions, when appropriate. Keep in mind, however, that the knowledge behind these instructions, and notes about them, might not be explained in the record, or might be kept under restricted access.

²¹ Laura Elliff Cruz's "[Indian Arts Research Center Collections Review with the Pueblo of Zuni](#)" under Case Studies, this volume.

²² See Cynthia Chavez Lamar and Jim Enote's case study, "[Setting the Record Straight](#)," in the School for Advanced Research's [Guidelines for Collaboration](#).

Things to Consider

- What is your institution's documentation-retention and management plan?
- How are your records and files (physical and digital) managed, maintained, and restricted?
- Can you create restricted levels of access within your database and filing system?
- How are files named? Is this standardized?
- How does the Freedom of Information Act (FOIA) affect your institution?
- What is your institution's plan for encrypted digital media?
- How is your network and database administered? Has your database administrator been trained regarding sensitive records and content?
- How are files shared when there is staff turnover? (See Section 12, Associated Documentation: [Documenting Your Practice](#).)

Public Access to Records

Museums have been moving toward digital curation and online collections databases (which are a form of digital exhibition), and there is an expectation that these institutions will become more transparent about what they do, and do not, share with the public. The boundaries of what might and might not become public should be established collaboratively with relevant communities. Do not share images of cultural materials online without consultation and consent from the appropriate community *before* records or images are digitized.

If materials are flagged as culturally sensitive after they have been made available to the public, remove them from the online database immediately and consult with the community to determine future access. Consider replacing the record with a notice explaining why the materials were removed.

To see the different ways databases can empower communities and incorporate their protocols, explore [Mukurtu](#) CMS and [Local Contexts](#).

In 2017, Gilcrease Museum was awarded an Institute of Museum and Library Services (IMLS) grant to support the cataloging, imaging, and digital publication of over one thousand Native cultural materials related to Nations now based in Oklahoma. Unfortunately, neither a plan nor funding for consultation was included in this project. Subsequently, in 2018, Gilcrease received a NAGPRA Consultation/Documentation grant to conduct collections reviews and consultations with fifteen Native Nations whose cultural materials were included in the digitization project. Those conversations yielded meaningful guidance on access and imaging protocols and led to several repatriations. However, because consultation was not the first step, some of the previously completed imaging and cataloging work needed to be restricted or completely destroyed. The digitization grant had to be amended to decrease the number of items that would become available online.²³

—Laura Bryant, Director of Repatriation at Gilcrease Museum

Establishing clear boundaries of access to information is especially important for publicly funded institutions and repositories. Institutions are accountable to the public trust but must also be mindful stewards to the communities represented in the collection.

The home page for [Peabody Museum Collections Online](#) at Harvard University's Peabody Museum of Archaeology and Ethnology includes the following disclaimer on its landing page:

"Collections and collections documentation may reflect past collecting practices and methods of analysis that are no longer acceptable. The Peabody Museum is committed to addressing problematic language in its database. Our staff continually update database records, striving for culturally appropriate descriptions and access.

"Collections Online may contain culturally sensitive content, and some culturally sensitive records and/or images may not be publicly accessible, such as those falling under the [Research Policy for NAGPRA Collections](#)."

²³ For more on this, see Laura Bryant, Marla Taylor, and Laura Elliff Cruz, "[Reconsidering Institutional Research Policies on Indigenous Collections](#)," *Advances in Archaeological Practice* (July 2025): 1–9.

Section 12

Associated Documentation

Documentation Management

Museums and other institutions often store information and images about collections in more than one place, and formats may be both physical and digital. Understanding internal record-keeping systems can help you become aware of the locations of all copies of documentation, and who has access to them. All procedures related to the original documentation, including retention and restrictions on access, should be applied broadly and transparently across all formats.

Information *must* be made available for consultations, even though it may be dispersed and embedded across various institutional formats and locations. Perform due diligence by finding all sources of documentation within a campus or large organization. Note the existence and location of this information to maintain connections to the sources.

Possible Types of Documentation

- access logs
- annual reports
- appraisals
- board meeting minutes
- conservation reports
- cultural affiliation studies (previously prepared)
- cultural resource GIS / database reports
- data sets
- deed of gift paperwork
- emails
- ephemera
- exhibition catalogs
- exhibition labels (historical)
- field notes
- letters
- loan paperwork
- newspapers (including student newspapers)
- photographs
- publications
- researcher requests or reports
- site locations

Possible Locations of Documentation

- archives
- biological supply catalogs
- card catalogs
- curators' and/or director's files
- exhibition files
- faculty or staff emails or other correspondence
- financial offices
- general counsel / lawyer's offices
- institutional memory (staff, volunteers)
- libraries
- medical schools
- old servers or databases
- operations and facilities offices
- other campuses or departments within the institution
- professors' offices or homes
- state archives



The suggested practices in [*Protocols for Native American Archival Materials*](#) (Society of American Archivists) address culturally responsive care for visual and audio recordings and transcripts, sensitive imagery, provenance and provenience documentation, cartographic materials, intellectual property, and more. Although some issues covered in *The Protocols* are also discussed in the *ICC Guide* in specific contexts, see the full *Protocols* document for further guidance on these topics.

[*Where Repatriation Meets the Protocols Resource Guide*](#) (Society of American Archivists Foundation) is another helpful reference.

Local, state, Tribal, and/or federal records laws (like the Freedom of Information Act, or FOIA) or protocols may dictate the circumstantial release or protection of these documents or information.²⁴ Consult with your institution's general counsel or the state attorney general to be sure you understand your obligations. If you receive a request for information and have a legal obligation to release records, notify any affected communities before you do so.

²⁴ The UCLA School of Law published a white paper on the subject. See Tribal Legal Development Clinic, UCLA School of Law, "[The Need for Confidentiality within Tribal Cultural Resource Protection](#)," UCLA School of Law, Native Nations Law and Policy Center (December 2000).

Content Sensitivity

Provenience and provenance documentation may contain culturally sensitive and/or disturbing information, language, or images. Be transparent, respectful, empathetic, and open in sharing and discussing these histories and contexts with community representatives. Shift your language as you move forward to avoid offensive phrases.²⁵

Similarly, review publicly shared content, including exhibition labels, websites, blog posts, institutional stock images, and so on. Consult with communities about whether, and how, to remove them from view.

Confidentiality

Institutional Notes and Records

Confer with communities to establish transparent guidelines about what should and should not be recorded by museum staff during conversations and consultations. Discuss what will happen with those notes afterward. Before adding notes or information to an institution's records, share draft documents with community representatives and omit any content upon request.

Be mindful of what information is shared when generating content using AI models.

The Press and Other Public Media

Establish protocols for responding to the press. Always check with community representatives before sharing *any* information, including contact information, with the press or other public media platforms. Inform community representatives of any requests for information under the FOIA or other applicable records laws.



Call to Action: Ensure that the promises you make are promises you can keep. Do not promise something you do not have the authority to deliver.

²⁵ See, for example, Bonnie L. Pitblado, Suzie Thomas, Anna Wessman, and Sophie Woodward, "[Rethorizing Archaeological 'Artefacts' as 'Belongings'](#)," *Archaeologies: Journal of the World Archaeological Congress* 21 (2025): 209–29.

Documenting Your Practice

Staff turnover, such as voluntary resignations and retirements, can undermine institutional knowledge and context about relationships, cultural care protocols, and past efforts. Make sure to document your own actions and decision-making processes about collections care.

To navigate these staff transitions, develop and establish procedures and protocols for archiving specific email correspondence, listing and updating primary points of contact, and codifying cataloguing standards.²⁶

Things to Consider

- Create a general shared email address that is accessible to and monitored by multiple relevant staff members.
- Actively transition relationships by notifying communities of changes to primary contacts.
- Record when documentation is created and updated and by whom.
- Update obsolete technologies to longer-lasting formats.
- Maintain similar standards for physical and digital files.
- Avoid jargon, initialisms, and acronyms. They might not be understood by other people accessing the files, could become outdated, and might not be easily cross-referenced later.

²⁶ For an example, see Sara Restrepo's "[Stockbridge-Munsee Community's NAGPRA Database: A Method of Recordkeeping for the Future](#)" under Case Studies, this volume.

Section 13

Imagery Protocols

Community protocols regarding sensitive imagery may encompass the inclusion of disclaimers, access restrictions, the removal of the images, and more. Examples of such imagery may include existing and new photographs, videos, recordings, and drawings—in physical and digital formats—that depict ancestral remains or culturally sensitive materials or excavations. Before any new imagery is created, institutions should consult with communities to determine the purpose and appropriateness of doing so. See [*Protocols for Native American Archival Materials*](#) (Society of American Archivists) for further guidance.



Call to Action: Be willing to permanently delete or repatriate all copies of sensitive imagery, both physical and digital, if requested by a community.

Institutions do not always own the copyright to or control the images in the collection. Understand where institutional control begins and ends when discussing restriction and repatriation options with the community.

To be mindful and respectful of content, use a “Restricted Image” JPEG icon in the database for imagery that staff cannot view and when sending reports to Indigenous communities. Be willing to share the imagery with the community representative upon request.

Examples of potentially sensitive imagery: 3D scans, condition photographs, daguerreotypes, drawings, excavation images or video recordings, exhibition images or video recordings, item identification images, maps, metadata of images, photogrammetry, X-ray images, and so on.

I was among several Tribal Nations representatives who were visiting a repository for an in-person NAGPRA consultation. We learned that several funerary objects had received 3D scanning in the past, and we were taken to the laboratory where they do 3D scanning and photogrammetry. One of the graduate students working in the lab had his computer on, and we saw a funerary object—one on which we were actively consulting—displayed as his wallpaper on his desktop screen. It was shocking to see staff using sensitive images like this for personal use. We were already caught off guard when we learned that NAGPRA funerary objects (those in Special Collections) had been photographed in this way without our knowledge or permission, and it was even more insulting to then find out these photos were used by employees for personal decorative purposes. It is important for institutions to limit access to sensitive information and photographs of NAGPRA collections. Staff should be better trained to respect boundaries and understand the importance of curating sensitive cultural information.

—RaeLynn A. Butler (Muscogee [Creek] Nation), Secretary of Culture and Humanities, The Muscogee (Creek) Nation

Section 14

Reproductions and Imitations

Cultural materials and sensitive iconography have been exploited inappropriately through reproductions and imitations made for commercial sale, exhibition, education, appropriation, or aesthetics. In addition, some items made to resemble cultural materials have found their way into museum collections. These reproductions may also have restrictions or protocols, similar to those for the originals, that should be observed; for example, they may need to be separated from other parts of the collection or destroyed. Reproductions may also be requested for repatriation.

Reproductions may take the form of items that are culturally appropriated, commercially made, or replicated. Some examples include:

- 3D prints
- 3D scans and associated data
- Boy Scout replicas
- casts (of artwork, funerary items, etc.)
- computer screensavers or wallpaper
- flint knapped replicas
- graphic designs
- national seals
- prints
- rock art depictions

No cultural material should be reproduced under any circumstances without written consent from the decision-makers in the affiliated community.²⁷

In 2019, the Smithsonian Institution worked closely with the Tlingit *Kiks.ádi* clan of Sitka, Alaska, to create a replica of an important religious object—a hat long in the Smithsonian collections, but broken. For more, see Eric Hollinger, [“Smithsonian Uses 3D Tech to Restore a Broken Sacred Object for Tlingit Indians,”](#) *SI Digi Blog* (blog), National Museum of Natural History, Smithsonian Institution, September 23, 2019.



Call to Action: To find all examples of reproductions and imitations, look beyond permanent collections. Examine props for exhibitions or programs, inspect educational/teaching collections, and scrutinize gift shop items. Use this opportunity to educate institutional colleagues on the importance of prior consultation and consent.

²⁷ For an example of Tribes and institutions working together on reproductions, see Sarah Shepard’s [“Institutional and Tribal Partnerships: 3D Models of Artifacts and Collections”](#) under Case Studies, this volume.

Section 15

Loans

Loan History

Be transparent with Indigenous community representatives about previous loans to or from other institutions or individuals, including loans for research. Share information about how the cultural materials were displayed, tested, accessed, interpreted, and otherwise used, and let the community know whether or not all components were returned to the originating institution.

Openly discuss any existing legacy or long-term loans, whether to or from your institution. Consult on preferences for physical placement and care, and inform representatives of any status changes.



Call to Action: Clarify and identify legal ownership and responsibility for loaned cultural materials, especially those subject to NAGPRA. For cultural materials that meet the qualifications of abandoned property, look to your state laws or state museum associations for guidance.

Loans Between Institutions

For outgoing loan requests of cultural materials, consult with and gain approval from the appropriate decision-makers within the community or communities affiliated with the items (see [Section 2, Decision-Makers and Points of Contact](#)).

Determine who needs to lead the consultation and receive the approval—you or the borrowing institution. The borrowing institution should follow all cultural protocols and be transparent about the intended use, access, display, context, and interpretation of the requested items.

Community or Tribal museums and cultural centers have a personal stake in exhibiting, sharing, and protecting their culture and cultural materials in their own community institutions. Producing some common loan documents, such as facility reports, can be obstacles to cultural centers. Be flexible and open to the larger benefits and impacts of the loan.



Things to Consider

- Who makes decisions about access and care while the material is on loan?
- What is the preferred frequency and method of communication throughout the process?
- Are there alternative security needs or environmental protocols?
- How do you mitigate potential pest or environmental impacts?
- Are there opportunities for cross-training between staff at the two institutions?
- What are the protocols for packing and for couriering material between institutions?



Community Cultural Use Loans and Loans to Communities

Representatives may request loans of cultural materials for use or for interaction within their community; for example, incorporating the item in a ceremony, examining materials to reawaken techniques and patterns, and so on. When items are being loaned for cultural use rather than to another institution, the loan parameters are usually different.²⁸ Direct conversations with the appropriate community representative (see [Section 2, Decision-Makers and Points of Contact](#)) can help define boundaries of use within the community. Understand and trust that the community knows how to care for their own cultural materials.²⁹

28 Chance Ward discusses this further in his essay “[History Colorado and Long-Term Tribal Loans](#)” under Case Studies, this volume.

29 For a real-world example, see Amanda Lancaster’s “[Pinguat \(Beads\)](#)” under Case Studies, this volume, where she describes giving a small group of beaders access to a set of ancestral beaded regalia.



Things to Consider

- Which is more appropriate—a shared stewardship agreement or a loan?
- What is the duration or frequency of the loan?
- Who from the community can request, approve, or pick up an item for loan?
- What type of security (protection protocols) will be in place when an item leaves an institution?
- Are loan decisions made publicly or privately?
- Communicate with your insurance agency to determine appropriate coverage and requirements, if possible.
- Where is the item kept when it is not in use while on loan?
- Ensure the community is aware of any previous treatments (see, for example, Section 10, Risk Management: [Chemical Treatments](#)) to an item, and consider additional efforts that could be made to maintain the safety of both the item and the community.
- Physical modifications of an item may occur during the duration of the loan. Make note of physical changes in the item records as appropriate.
- Ask the community if any handling, housing, or access protocols should shift after engagement.

Section 16

New Acquisitions

Acquiring Indigenous art for display in exhibitions or commercial use can be a great way to support artists and the community, but it can also be nuanced. Museums must approach all incoming Indigenous [Cultural Materials](#) (see Key Terms) appropriately and respectfully, regardless of the method of acquisition (purchase, donation, bequest, and so on).

Adopt a policy or procedure for contacting communities as part of the acquisition process, and have clear and consistent guidelines and communication throughout. Offer communities first refusal for any new acquisitions of cultural materials, and communicate reasonable timelines for decision-making.

Artists and community representatives may have different interpretations or understandings of how ideas, culture, and people can be used or represented. Museum staff should be aware of these nuances so they can make informed decisions regarding acquisitions. It is not the purview of the museum professional to parse these interpretations or say who is right or wrong.

NAGPRA's deadlines for summaries and inventories (43 CFR § 10.9(a)(2) and § 10.10(d)(2)) establish compliance criteria for new acquisitions of NAGPRA-eligible items. Museum staff should also be aware of and follow all relevant laws and regulations regarding the purchase or ownership of Indigenous cultural materials.³⁰ For example:

- Archaeological Resources Protection Act (ARPA)
- Bald and Golden Eagle Protection Act (BGEPA)
- Endangered Species Act (ESA)
- Indian Arts and Crafts Act (IACA)
- Migratory Bird Treaty Act (MBTA)
- Safeguard Tribal Objects of Patrimony (STOP) Act
- Visual Artists Rights Act (VARA)
- and state laws regarding abandoned property

Communities speak to the intent of cultural materials when an artist is not known; artists speak to the intent of their own work.

³⁰ See also [US Laws Affecting Museum Collections](#) in the Appendix.



Things to Consider about Institutional Intent

- What is the intent behind the acquisition?
- Does the item fit the institution's mission and collections scope?
- Does the institution have the capacity, resources, and relationships to take in a collection with a complicated provenance or provenience?
- What will the financial impact of the acquisition be on the institution, especially considering long-term care?
- Have you made the donor aware of the possibility for repatriation or the ethical return of the item?



Things to Consider about Legal Compliance

- Is it legal for a museum or institution to acquire this item?
- Would acquiring this item require complying with NAGPRA?
- Are any of the materials or components from items that may be subject to NAGPRA? Are similar items subject to NAGPRA?
- Are any of the materials subject to wildlife and plant protection laws?³¹
- Would the item, if sold today, comply with the Indian Arts and Crafts Act?³²
- Are there tax implications for the donor that need to be communicated? (Understand tax laws surrounding donations and how repatriation can impact donors and institutions.)



Things to Consider about Provenance

- What is the provenance of the item? Is the provenance complete or are there gaps?
- Who is providing the provenance? Can you verify its accuracy?
- Was the item made for commercial sale within a community, or for a collector market and public display?
- What is the artist's intent in selling or donating their artwork?
- Did the artist make and sell this item of their own free and informed will? If the artist did make and sell the item freely, who documented this process?
- Is this item from a location or time period that has a history of sales made under duress?
- Was the item sold or donated by other family or community members? Did they have the legal and cultural right to do so?

31 For example, the [Bald and Golden Eagle Protection Act](#) (BGEPA), the [Endangered Species Act](#) (ESA), and [Migratory Bird Treaty Act](#) (MBTA).

32 The [Indian Arts and Crafts Act](#) and the [Visual Artists Rights Act](#) provide guidance and structure for museums to support contemporary Native artists and their rights.

Things to Consider about Ethics

- Is the affiliated community interested in acquiring this item?
- What is the best decision for the items and for their associated communities?
- Is the item meant to exist in perpetuity?
- Does the institution already have community guidance connected to this work or to the subjects depicted?
- Can you or the institution contact the artist or the artist's family for further information or context, or to discuss special care or conservation needs?
- What do you do when the artist's intent is to push the boundaries of what their community is comfortable with, or when the artist disagrees with the community's current administration?
- Is the gallery or seller acting with the artist's best interests in mind?

Unexpected Donations and Bequests

Unsolicited donations and unexpected bequests of cultural materials are a reality; however, there is no single, easy path to deal with unprovenanced or unprovenienced cultural materials. Maintain transparency when consulting with possibly related Indigenous communities to determine the best path forward. When context or potential affiliation can be determined, follow the appropriate legal and ethical steps.

The Berkshire Museum, with whom we have a good relationship, called us stating that someone had dropped off a box of points and wanted to know if we would like them. The points did not appear to be NAGPRA-sensitive, but they did not have use for them in their collection. Our Tribal Historic Preservation Officer looked at the pictures they sent and determined that—because of where the points came from and the breadth of time they sampled—we could use them in our own teaching collection. Stockbridge-Munsee Community works with local interns, and we are also trying to promote careers in historic preservation among our youth. Berkshire Museum was able to gift the points to us easily because they never accessioned them, and we can now use them when teaching youth that we work with.

—Sara Restrepo, Program Coordinator for the Stockbridge-Munsee Community Tribal Historic Preservation Office



It seemed like a good idea at the time for the volunteer to accept a box of items from a descendant of one institution's founder. A bit of sleuthing, however, revealed that the items were likely among those the descendant had described as acquiring when she had previously written about her adventures for a popular publication. What may have been acceptable to the general reading public at the time can now be seen for what it was—thrift and grave robbing. This was brought to the attention of staff members, and the institution's media consultant concluded that the institution should not accept the gift with the intention of then complying with NAGPRA. Instead, the institution provided the donor with resources to return the items either to the originating community or to a museum that had a trusted relationship with that community. These resources included community contacts and contacts for museum staff that the institution had already reached out to about the items.

—Jan Bernstein, Founder of Bernstein & Associates NAGPRA Consultants

Section 17

Non-Permanent Collections

Indigenous cultural materials can be present in non-permanent collections. Non-permanent collections are materials in an institution's physical custody or under its legal control that are outside the primary, accessioned collections. These may include non-accessioned collections, education or teaching collections, long-term loans, experimental and field school materials, exhibition props, and replaceable display items. Each institution will define these categories and the items within them differently.

Be transparent with communities about *everything* in your custody or control, and apply culturally appropriate care as needed.

Many institutions have specific items that they regularly use for education, whether for classes, as hands-on teaching tools, for sampling and experiments, or as exemplars of common items. When developing or assessing these collections, consult with communities to identify the appropriate materials to utilize.

79

Cultural Materials Found in Collections

Sometimes, collections include cultural materials that have no identifiable provenance or associated information. Establish procedures on how to move forward with these items to avoid perpetuating unresolved issues.

Always notify the appropriate community or Nation when a previously “lost” item is located within the collection.

For abandoned property, follow state laws (if they exist) or guidelines from regional museum associations or state associations.

Section 18

Deaccessions

Deaccessioning is a regular and healthy process in collections management. Deaccessioned items might be repatriated, transferred to another institution or community, sold or auctioned, or intentionally destroyed. It is important to consider federal laws for wildlife and plant protections when deaccessioning.³³

Repatriation is another form of deaccession. Follow the regulations and guidelines provided in NAGPRA to ensure compliance with federal repatriation law.

Approach decisions around deaccessioning and disposal ethically, and focus on what is appropriate for the materials. Clearly communicate your deaccession process and timeline with the associated community. During consultations, exhaust all other options before considering the sale or auction of cultural materials.

When your institution deaccessions cultural materials, always be transparent and **prioritize returning them directly to communities**. Ensure that your institutional policy provides a pathway for returning items, and allows for consultation with the identified community about proper disposition. You may voluntarily deaccession items for repatriation, beyond what is legally required, for ethical reasons. Share with the community any related legacy documentation about the items, and consider returning other associated documentation and records as well.

The [Going Home Fund](#) of the Association of Tribal Archives, Libraries, and Museums (ATALM) was established in 2022 to make it easier for institutions to voluntarily return items to Native communities. See more under “[Programs](#)” on the ATALM website.

Also, let appropriate community representatives know about historical deaccessions and dispositions of cultural materials.

The retirement of a belonging is the appreciation of its existence and end of its life as an artwork or cultural object. Retirement in this case means resting the belonging from its functional purpose as an aesthetic, cultural, and/or historical object. Retirement does not mean loss, but a release or transformation of a belonging’s purpose to a state of rest.

—Sana Murray, Delaney Prendergast, Samantha Giguere (Thessalon First Nation), and Lorna Maie Thomas (Akwesasne Mohawk Nation) at the University of Toronto Master of Museum Studies

³³ See [Laws Affecting Museum Collections](#) in the Appendix.

Section 19

Self-Care



Due to the violent legacy of collecting of many museum and collecting institutions, Indigenous staff may carry an additional emotional burden when working with culturally sensitive materials. It is important for collecting institutions to be aware of the impact that working with these items might have for Indigenous staff members, and it is important for staff members to follow the appropriate cultural protocols of their own communities.

—Alexis Lucero (Pueblo of Isleta), Assistant Collections Manager at the Indian Arts Research Center, School for Advanced Research (SAR)

Working in this field—the emotional and spiritual labor it requires—can place people into direct contact with historical and ongoing trauma. These interactions can be intentional or unintentional. Sometimes, as the “face” of an institution, you can be the recipient of built-up frustrations and intense emotions. Be gentle with yourself and recognize that everyone, including you, comes into these spaces with their own level of privilege and positionality. Lean into this self-awareness and try not to become defensive. Remember, you may now be part of the healing process for this community and future generations.

Staff who come into contact with trauma can exhibit vicarious trauma. This can manifest physically, so listen to your body and reach out for support. The National Native Boarding School Healing Coalition website has resources for [self-care](#), and the New York State Office of Mental Health offers a [Grief Counseling Resource Guide](#).

Michelle Ganze and Veronica L. Denison's *A Practical Guidebook to Trauma-Informed Archival Practice* (Bloomsbury Publishing, 2026) highlights practical approaches to minimize vicarious trauma.

Consider your own energy and emotional state before you engage in planned interactions with sensitive materials or ancestral remains. Check in with yourself mentally and spiritually before you initiate the work. The intentions and emotions you bring into your work can affect you, the items you interact with, and the broader community. If necessary, reschedule or give yourself space.

Self-Check Questions

- What are my goals? What is the intention behind the work I am about to undertake?
- How am I feeling? Am I able to focus on the task?
- What are my assumptions about the work I am about to do?
- What can I prepare for? What is beyond my control?
- Have I established a safe and respectful environment for this work?

We've described this to students as, like, we wouldn't work with collections if we were covered in nacho cheese, so we shouldn't work with collections if we are emotionally/spiritually covered in nacho cheese.

—Amy Cao, Collections Manager & NAGPRA Specialist at the Center of Southwest Studies, Fort Lewis College

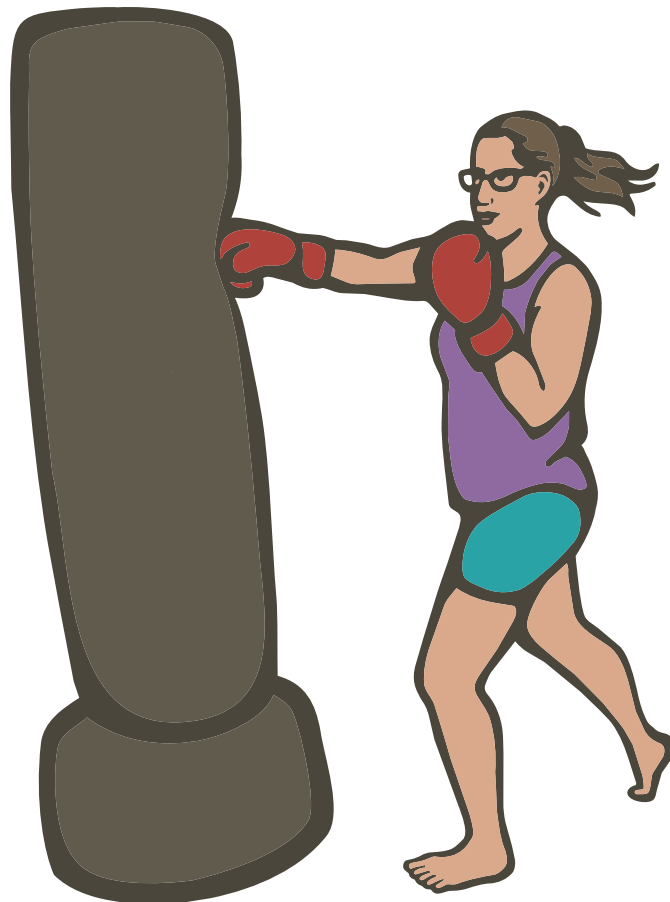
Self-care is an intentional practice and will look different for everyone. Alexis Lucero (Pueblo of Isleta), quoted at the beginning of this section, shared some culturally informed methods of self-care for Indigenous museum staff, including “smudging/purification using appropriate medicines, going for a walk to get fresh air, attending ceremonies or cultural events, connecting with other Indigenous museum professionals, talking to religious and/or cultural leaders in your community, [and] journaling or writing about your experiences working in collections.”

Don't forget to make time for yourself and your staff. The practices mentioned in this guide, and constantly advocating for them, are incredibly important, but so are the people doing the work. Recognize that you only have so much emotional capacity, and that your well-being is important. Give others time and space to focus on their well-being also.

Practice mindfulness or grounding techniques to help stay calm when intense emotions occur.

The spiritual nature of this work is not always clear as good, bad, or somewhere in between—think of it as a spectrum. No matter what, we protect ourselves. So I approach this work with care and respect, always maintaining my own spiritual care and responsibilities rather than assuming every interaction is inherently harmful. Ancestors going home is positive. Reconnecting cultural items is positive. Leading to healing is positive.

—Chance Ward (Lakota—Cheyenne River Sioux Tribe), NAGPRA
Coordinator at History Colorado



Section 20

Accountability and Advocacy



84

Throughout the *ICC Guide*, we advocate for ethical practices and the integration of defined values into collections stewardship across the field. The frameworks outlined in this guide cannot be realized by any one individual, institution, or Indigenous community: There must be a collaborative effort on multiple levels to achieve shared goals. In this section, you will discover how to hold yourself, institutions, and the museum field accountable, and how to advocate to institutional leadership.

In the [Administrative Handout](#) (see the Appendix) you will also find specific language to help you advocate to institutional administration, guidelines for implementation at the administrative level, and tools to advocate for changes in museum standards and funding requirements.

Institutional Administration

Guiding Frameworks

The best way to implement and sustain the frameworks outlined in the *ICC Guide* is to integrate them into institutional policy and codify them in administrative documents. Policies help inform where you allocate your resources, including staffing and funding; ensure that practices continue beyond individual employees; and hold the institution accountable. The positive impact of rewriting those policies to center culturally appropriate collections stewardship practices cannot be overstated.

Accountability starts with awareness. Integrate cultural care approaches into all policies that impact collections stewardship. Buy-in, participation, and consistency from the highest levels of institutional administration will cultivate ongoing support for this approach.

For an example of and guide to allyship, see [“When the Wabanaki Thrive, We all Thrive: Abbe Museum’s Sovereignty Guide for Allies.”](#)

Be an Ally!

- **Understand and Support Sovereignty:** Do your research; write your representatives to express your support; emphasize sovereignty with your choice of words: Tribal Nations and Tribal Citizens (vs. Tribes and Tribal members).
- **Make Indigenous Peoples Visible:** Demand accurate and inclusive media coverage; acknowledge Indigenous homelands at all public gatherings
- **Hand Over the Mic:** Resist speaking for Indigenous organizations and peoples.
- **Support Indigenous and Native-Run Organizations:** Donate your time, talent, funds, amplify messages on social media.³⁴

To avoid over-promising and under-delivering, institutions must engage in self-reflection, during which they pause and consider where they are now, where they want to be, and what resources exist or are needed for this work. This process will lead to more authentic, transparent, and realistic relationships. One helpful tool is Jenn Edginton’s [“The Indigenous Ally: Museum Practitioner Toolkit.”](#)

³⁴ These guidelines on being an ally have been lightly edited to make them generally applicable to all Indigenous peoples rather than specific to the Wabanaki. You can see the original on the Abbe Museum’s [allies guide](#) website.

Staffing Resources and Representation

Representation matters, and institutions should embrace diversity on all levels by actively encouraging and recruiting Indigenous representation in staff and on institutional boards and committees charged with overseeing collections stewardship.

Cultural care approaches and protocols should be addressed in regular training for *all levels of staff* as well as volunteers.

Institutions can support professional development for staff, where they can learn more about cultural competency and implementing culturally appropriate care (see [Professional Development and Training Opportunities](#) in Section 20, Accountability and Advocacy). They can also recognize the need for flexibility to support staff in their self-care and cultural needs.

Funding

Budgets are moral documents.

Institutions can demonstrate their commitment to cultural care by allocating funds to support all aspects of it, including:

- hiring, retaining, and supporting professional and dedicated staff to implement and sustain this work, and compensating them competitively
- building in funds for contracts, honoraria, travel expenses, and food
- exploring low-cost approaches to reciprocity such as hosting a potluck meal; offering free use of museum spaces or resources (staff time, extra supplies, or expertise); giving handmade or local gifts; or traveling to communities
- evaluating budgets for any specialized housing or care supplies
- identifying potential external funding sources like grants, motivated donors, or foundations

Building Capacity

Fully realizing and implementing the approaches in the *ICC Guide* will not happen immediately, although some Indigenous collections care practices can become integrated into daily museum tasks and do not require additional time or resources. As an institution continues to build upon this work, however, it may be necessary to hire additional staff or reallocate resources to focus on these valuable conversations and relationships. Develop a strategic plan that commits to building capacity and collaboration with communities and other institutions (mutual capacity building).

Strategies to building capacity include:

- hiring staff through grant funding or strategic fundraising
- inviting speakers on repatriation or cultural care into board meetings or other high-level conversations
- shifting existing institutional resources and priorities toward collections stewardship and relationship building
- reallocating funds from existing sources (for example, a percentage from image use rights or ticket sales) toward hosting a collections review
- strategizing priorities and resource needs with your professional staff
- identifying partner institutions or departments that may have time, resources, or knowledge to contribute to culturally appropriate care
- removing barriers to community participation and access to collections

I worked at a very small museum, and we did not always have the budget to offer payment to Tribal partners. We would still offer our labor by coming to their Tribal school events to run a booth, offer free field trips for Tribal school classes, give handmade gifts, etc. Even if it's not monetary, these are valuable ways to show investment and respect in a long-term relationship.

—Justice McNeeley (l̓n̓upiaq), Repatriation Manager at the Burke Museum of Natural History and Culture, University of Washington

Strategies for mutual capacity building include:

- writing a grant that funds both the institution and the Indigenous community
- volunteering your time with the community as appropriate
- reciprocating hosting locations
- hiring an individual to be the liaison between communities and the institution
- offering reciprocal training in specialized skills and knowledge
- creating opportunities for fellowships, internships, or mentorships for community members at your institution
- promoting and supporting each other through social media, marketing campaigns, and rack cards

Evaluation

It is important to evaluate your efforts to know if they are successful. Determine what a successful project or event looks like and then develop tools to assess it, such as talking to community partners about their experiences, conducting staff and partner surveys, and tracking interactions with communities across the institution, both during and after, if possible.

Follow-through is essential; be prepared to shift your approach based on feedback. Do not seek input about things you cannot deliver. Set realistic goals and be flexible as you receive feedback.

Many evaluation resources already exist. Here are some places to start:

- [Museum Social Impact Toolkit](#): developed as part of the Measurement of Museum Social Impact, to collect and analyze social impact data
- [American Evaluation Association](#): a general description of and background about program evaluations, by the eponymous association
- [IMLS Evaluation Resources](#): a list of various evaluation resources from the Institute of Museum and Library Services

Museum Field

This section speaks broadly to the entities with interests that support and drive the museum field and museum standards by providing training, professional support, and resources. Collections stewardship is the invisible infrastructure through which the rest of the museum functions. Museums are inherently colonial, and these practices must be addressed by the field as a whole.

Professional National, Regional, and Oversight Associations

- Integrate cultural stewardship expectations into accreditation, publication, and grant application standards.
- Codify the values found in the *ICC Guide* into organizational codes.
- Provide access to and recommendations for tools and templates that embrace Indigenous perspectives and ethical practices.

Funding Organizations

- Require letters of support and evidence of collaboration from related communities for proposed projects.
- Create opportunities to fund collaborative collections stewardship projects.
- Offer endowment funds for positions in communities and in institutions supporting this work.
- Expand definitions of what is and can be funded as part of collections stewardship.

The Grants team at CT Humanities (CTH) recognized that formal guidance was needed for potential grantees who demonstrated an interest in exhibits and programming around Indigenous topics. CTH convened a working group based on its IDEA (Inclusion, Diversity, Equity, and Accessibility) Committee, bringing together staff, board, and Tribal Citizens to draft the [Indigenous Values Statement](#) and a Toolkit with resources and FAQs. These have become the guiding principles for CTH's granting program and other work involving Indigenous stories, emphasizing Tribal self-determination and sovereignty, Indigenous resilience and perspective, and relationship building.

—Jason Mancini, Executive Director, CT Humanities; endawnis Spears (Diné/Ojibwe/Chickasaw/Choctaw), Practitioner-in-Residence for Tribal Engagement, Brown University, and Co-Founder, Akomawt Educational Initiative; Ruth Garby Torres (Schaghticoke), Tribal Community Member-in-Residence/Student Engagement Specialist, Brown University; and Becky Vitkauskas, Grants Officer, CT Humanities

Vendors of Products and Services

- Purchase from archival supply vendors that offer culturally appropriate, ethically sourced materials.
- Select a collections management system/database that offers integrated fields or modules to support culturally appropriate care. This system should also be able to restrict viewing of images and records, support fonts and character encoding standards for Indigenous languages, and include modules dedicated to recording cultural care needs.
- Museum gift shops should acquire authentic products and art that are compliant with the Indian Arts and Crafts Act and advertise these accordingly. Avoid buying, selling, or advertising replica or real archaeological material.

Higher Education

- Promote initiatives and opportunities to learn about culturally appropriate care, especially for students and emerging professionals. Develop opportunities for Indigenous students and community members to participate in this work. Support mentorship programs and paid internships.
- Incorporate the philosophy and practice of culturally appropriate care into curricula.
- Connect students with museum professionals who are implementing culturally appropriate care.
- Foster a culture of accountability through faculty and staff engagement with communities in use and access to Indigenous collections. Encourage and offer students opportunities to interact with communities as part of supervised internships and research projects.

Professional Development and Training Opportunities

- Include conflict management, project management, and cultural sensitivity and competency training as part of regular continuing education opportunities.
- Solicit conference presentations and webinars on culturally appropriate care, and schedule those talks during high-attendance and high-impact days and times.
- Support mentorship programs, such as the [Native Emerging Professionals Network](#) of the Association of Tribal Archives, Libraries, and Museums (ATALM).
- Offer scholarships and tiered pricing levels for professional development opportunities.

Existing Resources and Support

Other Related Guidelines

- Canadian Conservation Institute. [Caring for Sacred and Culturally Sensitive Objects](#). Government of Canada, Canadian Conservation Institute, 2018.
- Canadian Museums Association. [“More than Giving Back: Repatriation Toolkit](#). A Toolkit in Support of Moved to Action: Activating UNDRIP in Canadian Museums.” Canadian Museums Association, 2022.
- Collison, Jisgang Nika, Sdaahl K’awaas Lucy Bell, and Lou-ann Neel. *Indigenous Repatriation Handbook*. Royal BC Museum and Haida Gwaii Museum at Kay Llnagaay, 2019.
- Danyluk, Stephanie, and Rebecca MacKenzie. [Moved to Action: Activating UNDRIP in Canadian Museums. A Response to the Truth and Reconciliation Commission’s Call to Action #67](#). Canadian Museums Association, 2022.
- Davy, Jack. *Native Americans in British Museums*. Elements in Critical Heritage Studies. Cambridge University Press, 2021. Includes historical background and collections-related sections in dialogue.
- German Museums Association. [Guidelines for German Museums: Care of Collections from Colonial Contexts](#). 3rd ed. German Museums Association, 2021.
- Global Indigenous Data Alliance (GIDA). [“CARE Principles for Indigenous Data Governance.”](#)
- Haakanson, Sven D., and Amy F. Steffian. [The Alutiiq Museum’s Guidelines for the Spiritual Care of Objects](#). 2004.
- Museums Australia. *Continuous Cultures, Ongoing Responsibilities: Principles and Guidelines for Australian Museums Working with Aboriginal and Torres Strait Islander Cultural Heritage*. Museums Australia, 2005.
- Ogden, Sherelyn, ed. *Caring for American Indian Objects: A Practical and Cultural Guide*. Minnesota Historical Society Press, 2004.
- Pegno, Marianna, Christine Brindza, Patricia Lannes, Kristopher Driggers, and Cecilia Garibay. [Community-Based Curation: A Toolkit for Expanding Narratives and Changing Practice](#). Tucson Museum of Art, 2024.
- [Protocols for Native American Archival Materials](#). 2007.
- School for Advanced Research. [Guidelines for Collaboration](#).

- School for Advanced Research. [Standards for Museums with Native American Collections](#) (SMNAC). School for Advanced Research, May 2023.
- Smithsonian Institution. “[Shared Stewardship and Ethical Returns Policy](#).” Smithsonian Institution, April 2022.
- Society of American Archivists Foundation. [Where Repatriation Meets the Protocols Workbook](#). Society of American Archivists Foundation, 2021.
- Society of American Archivists. [Archival Repatriation Committee](#) and Protocols.

Resources and Organizations That Can Offer Support and Community

- Advisory Council on Historic Preservation (ACHP)
- Association of Tribal Archives, Libraries, and Museums (ATALM)
- Association on American Indian Affairs (The Association)
- Bridging the Gap
- Contaminations and Pesticides Repatriation Informal Working Group
- ENRICH Cultural Institutions Network
- Global Indigenous Data Alliance (GIDA)
- Local Contexts
- NAGPRA Community of Practice, and regional communities
- National Association of Tribal Historic Preservation Officers (NATHPO)
- National NAGPRA Program
- [Native Hawaiian Intellectual Property \(NHIP\) Working Group](#)
- School for Advanced Research (SAR)
- [Your Neighborhood Museum \(YNM\)](#)

Training and Professional Development

- Advisory Council on Historic Preservation (ACHP)
- American Association for State and Local History (AASLH)
- Center for Collections Care (C³), Beloit College
- Cultural Diversity Competency, Society of American Archivists
- Getty Post-Baccalaureate Conservation Internships
- Intensive NAGPRA Summer Training and Education Program (INSTEP)
- Institute of American Indian Arts (IAIA)
- National Preservation Institute (NPI)
- The Sustainable Heritage Network (SHN)

Grant and Funding Opportunities

- Going Home Fund, Association of Tribal Archives, Libraries, and Museums (ATALM)
- Henry Luce Foundation
- Institute of Museum and Library Services (IMLS)
- Lilly Endowment
- Margaret A. Cargill Philanthropies
- Mellon Foundation
- NAGPRA Consultation/Documentation grants and NAGPRA Repatriation grants through the National NAGPRA Program
- National Endowment for the Humanities (NEH)
- and grants or funding opportunities through Tribes or Indigenous foundations

Case Studies

Building Research Relationships with Contemporary Native Nations

Dr. Aimée E. Carbaugh

Osteologist and Consultation Specialist, NAGPRA Office, University of Illinois Urbana-Champaign

For my doctoral dissertation project, which focused on two mortuary Mound groups in Illinois, I consulted with representatives of Native Nations. The project grew from the recognition of the University of Illinois's role in funding archaeological ventures that removed Ancestors and their funerary belongings from their places of interment and facilitated their dispersal among multiple academic institutions in the Midwest and on the East Coast. After my initial background research, the project began to take shape—one aimed at acknowledging the harmful legacy of these archaeological endeavors and reuniting the dispersed histories of these two Ancestral sites.¹ Because the project included direct interactions with Indigenous Ancestors and belongings, I needed Tribal input and approval to proceed.

I used the contact information for each Tribe, obtained from their website or other online databases, and sent emails to either the NAGPRA officer, the Tribal Historic Preservation Officer, or the Cultural Resource Officer for each Tribe, if a person was identified as such. If a representative was not identified in one of these roles, I contacted the Chairperson for the Nation. My introductory email included a brief statement about myself and an overview of the mortuary sites, and expressed my interest in talking about the proposed project and what their community might be interested in learning. If I didn't receive a response, I followed these email introductions with additional emails as well as phone calls.² I documented all communications with each Nation in separate Excel tables.³

Contacting Native Nations

Using the Tribal Directory Assessment Tool (link available on the NAGPRA website), I compiled a list of Native Nations to approach about the project based on the county where the Mounds are located. I then expanded the list to include the Nations that signed the two treaties covering the county and the Tribes for whom Illinois is part of their Ancestral homelands.

Some Tribal representatives responded that the sites were in an area of Illinois outside their homelands or that their communities postdate the Mounds. While these Tribes did not join the project, several asked to be kept apprised of the project's outcomes. The Native Nations that wanted to be involved because of their connection to the area and the Ancestors requested more-detailed information. The Tribal research approval processes varied, but they included providing a short proposal detailing the work to be done and what would not be done (for example, no

1 My knowledge and background—I am a graduate student with extensive experience in Illinois bioarchaeology and state certification as an osteologist—allowed me to undertake this work, devote the time necessary to complete a project of this scale, and access necessary funding resources.

2 I did not receive direct responses concerning my proposal from each of the fifty-seven Native Nations on my original contact list.

3 All the institutions I visited required a list of the consulting Tribes before they would approve my research request. Since consultation was part of my research design and had already begun, the requested information was readily available.

imaging or sampling), as well as having phone conversations with Tribal representatives and, in one instance, a council of Elders.⁴

Tribes were interested in the project and supported my proposed documentation of the Ancestors and their belongings. Tribal representatives wanted to ensure that the Ancestors and funerary belongings removed from the Mounds were fully accounted for. In addition, they wanted to learn about the Ancestors' experiences while held in institutions.

Building and Maintaining Relationships

Of the Tribal Nations that responded, nine indicated they wanted to be kept apprised of the progress made. I maintained a cloud-based folder to serve as a central location for sharing information and documentation with the partnering Tribes. The folder included information about me (CV, dissertation committee members), the project proposal, site documentation, and prior publications about the sites. I sent email updates to the nine partnering Tribes throughout the project, documenting progress and findings made through archival research, and I also uploaded these emails to the shared cloud folder. I had periodic conversations with four of the Tribes in which we discussed more specific details, such as respectful language use, and clarified the type of information their Nations were interested in. Additionally, I sent drafts of presentations (for example, the conference poster) and publications related to the project to the Tribes for review prior to publication.

Final Thoughts

My dissertation project was shaped by my conversations with Tribal representatives. The experiences of Ancestors while being held at institutions became a focus of discussions, as Tribal representatives expressed concern and frustration at not knowing their Ancestors' histories and how they have been treated. This project was successful, in part, because from the beginning it prioritized gathering the information necessary for completing the NAGPRA process as part of the research goals and actively worked to address the harmful histories of Ancestors held within institutions without their community's consent. To ensure that Native Nations are the ones making decisions about their Ancestors and cultural heritage, any future research or publications that include the Ancestors and belongings from these two Mound groups will require Tribal approval.

For similar projects in the future, I would alter my proposal to provide quarterly group email updates rather than individual updates; schedule regular group Zoom meetings; create opportunities for in-person meetings; and include compensation to support the participation of Tribal representatives.⁵

⁴ This project originated at the beginning of the COVID-19 pandemic, impacting my initial plans to visit Tribal communities in person. Instead, these initial conversations took place over email, phone, and Zoom.

⁵ The research funding sources for this project were focused on covering travel expenses associated with documenting the Ancestors and belongings held at different institutions. When this project began, funds were not available to compensate Tribal representatives.

Indian Arts Research Center Collections Review with the Pueblo of Zuni

Laura Eliff Cruz
(Choctaw Nation of Oklahoma)

Director of Collections, Indian Arts Research Center, School for
Advanced Research (SAR)

In 2009, Cynthia Chavez Lamar—former director of the Indian Arts Research Center (IARC), a division of the School for Advanced Research (SAR)—contacted the Pueblo of Zuni about a collection of seventy-eight pottery items that were labeled as “Part of the IAF Collection of Zuni Pseudo-Ceremonial Pottery.” Clarifying whether the items were pseudo-ceremonial or possibly ceremonial would impact access restrictions if there were research inquiries. Chavez Lamar’s initial query and invitation eventually developed into something much larger: Why not review the IARC’s entire collection of eleven hundred items from the Pueblo of Zuni? To this end, goals and outcomes were established between IARC staff and the designated Zuni cultural advisors, and physical reviews continued intermittently for over six years, with a data review process that followed continuing for an additional three years.

Database fields were repurposed to record whether or not research access was permitted, creating a standard for interfacing with shared protocols. For example, the “Tribal Instructions” field indicates the handling, housing (storage), access (research), photography, and publication restrictions established by collections review participants for each item. The “Tribal Collection Review Remarks” field adds any notes made by the collections review participants, including correcting inaccuracies. Although this work may seem overwhelming, it is also rewarding and can streamline and shorten the review process going forward. Since 2009, the continuance of the collections review process created collaborative relationships with each community and IARC staff. This collaborative avenue is not viewed as a NAGPRA consultation, though items are occasionally identified as culturally sensitive that were previously unknown to staff. These conversations help inform approaches to culturally appropriate care, which varies among communities, and guide policy development. This includes identifying items to restrict from future research and access and establishing smoother pathways for incoming research requests.

The process that grew from the initial collections review with the Pueblo of Zuni has defined the policies and procedures of the IARC, especially those related to research access, and has led to meaningful and collaborative relationships.

Traces of Life: Honoring Evidence of Use During Conservation

Elly Stewart Davis

Assistant Objects Conservator, Gilcrease Museum

 When conservators prepare an object for exhibition, they collaborate with multiple professionals and stakeholders throughout the process to ensure that the desired result is achieved. Often this work is done in consultation with curators; however, when the object is connected to living communities and artists, it is of the utmost importance that the wishes of the community are heard and respected. Rather than focusing on traditional conservation goals of cleaning and visual “restoration,” the work shifts toward stabilizing the object while honoring the story carried in its wear and surface changes. The scratches, patina, discoloration, and accumulated materials are understood not as damage but as meaningful evidence of the object’s life, relationships, and continued cultural relevance.

During preparation for an exhibition installation at Gilcrease Museum in Tulsa, Oklahoma, a pair of Arapaho beaded buckskin leggings in the collection (fig. 1) were considered for display. There were numerous concerns about their condition, though, because the leggings had been housed flat for many years. It was decided—through careful deliberation with representatives from the Cheyenne and Arapaho Tribes, who had selected the leggings for the exhibition—that the condition issues caused by their life in the collection should be treated and stabilized while evidence from their life as a worn clothing item should be retained.

To avoid stressing or staining the delicate buckskin, creases from long-term flat storage were gently eased by supporting the form with custom internal mounts rather than by using moisture. Surface dust was lightly removed through dry cleaning methods, while stains and any original applied pigments were intentionally left untouched. Areas of old damage were stabilized by reinforcing existing historic repairs and using compatible materials placed through original stitch holes, minimizing the creation of new intervention points.

Several visible features that reflected the leggings’ life of use were preserved; for example, staining and wear at the lower fringe where it would have had contact with the ground, as well as natural leather bulging at the knees from repeated movement. The beadwork was cleaned only enough to remove loose surface dust, while older, use-related soiling was retained. The original leather straps attached to the breechcloth were not used to support the weight of the object for mounting. Instead, to distribute weight safely throughout the leggings, a custom mannequin support system was built (fig. 2). The result was a pair of leggings that maintained their authentic appearance and visible history of use while also being structurally stable and safe for exhibition (fig. 3).

In this context, the conservator's role centered on preventive rather than aesthetic care. This approach affirms Tribal authority over how their cultural materials are presented and interpreted, emphasizing that authenticity is found not in visual perfection but in the honest record of use and lived experience embedded in the object itself.



Fig. 1. Beaded buckskin leggings, 19th–20th century, Cheyenne and Arapaho Tribes, emulsion processed leather/buckskin, glass beads, sinew, and applied red and yellow pigment. 84.1735a-b, Gilcrease Museum, Tulsa, Oklahoma. Photograph by Claire Cross



Fig. 2. The internal padded mannequin structure will support and distribute weight throughout the leggings. Photograph by Elly Stewart Davis



Fig. 3. The leggings are mounted on the mannequin form during a test fitting for the exhibition. Photograph by Elly Stewart Davis

Collections Care Notices at the National Museum of the American Indian

Emma Dixon

Former Program Specialist, National Museum of the American Indian

At the National Museum of the American Indian (NMAI), we acknowledge that some of the items housed in our care are regarded as living and that all items have connections or relationships to living cultures, communities, and peoples. As such, NMAI has integrated cultural care protocols and guidelines into its standard stewardship practices since its founding in 1989. These protocols are informed by consultations, collaborations, and partnerships with Tribes and communities throughout the Western hemisphere and provide guidance related to the care, stewardship, access, and use of collections housed at the NMAI.

Since 2020, NMAI has enhanced its documentation of cultural care guidelines. It has made protocols more accessible to staff for implementation and more visible to visitors for review and discussion. As part of this work, NMAI partnered with Local Contexts to develop Collections Care Notices (CCNs), which are visible markers that indicate cultural rights, protocols, and responsibilities associated with a collection item and govern the care, display, and access to cultural materials within collections.

CCNs in Practice

As of 2024, there are eight CCNs or categories of cultural care, each with their own meaning. Below are four examples of CCNs accompanied by NMAI's interpretation.



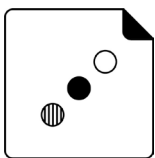
The **Authorization** CCN indicates that Tribal or community authorization through consultation is required for any reproduction of this item, including use in exhibitions and publications both in print and online. NMAI uses this CCN to describe protocols stating that permission is required to photograph, exhibit, publish, upload to the web, and access or research an item. For transparency, NMAI provides an inventory level of information of these items publicly but redacts sensitive descriptive information, including images, until consent is obtained.



The **Belonging** CCN indicates that only specific persons belonging to communities, clans, or societies have the right to access and handle these specific items or collections. NMAI uses the Belonging notice to indicate an item may only be accessed and handled by Tribal or community members, or more specifically by clan or society members. Similar to the Authorization CCN, NMAI provides inventory information about these items but withholds description information, including images, from the public.



The **Caring** CCN indicates that specialized care is required. NMAI applies this for items that have specific housing requirements. For example, some items must be covered or housed on higher shelves to ensure they are not casually viewed or handled. Some items should be housed facing east, or closest to the ground to be near the earth. And some items should be housed next to or away from other items.



The **Gender Aware** CCN indicates that there are specific gender responsibilities that affect who can access and/or handle this item or collection. In the NMAI collections there are items that should be handled or generally accessed only by males or females. NMAI asks staff and visitors to reflect on guidelines based on their self-identified gender.

NMAI has incorporated CCNs into its Collections Information System (CIS) and on the physical storage housing mounts.

The museum uses Axiell EMU as its CIS. Cultural care information is documented in the rights module and links to the catalog records. This makes it easy for staff to attach one set of instructions to multiple catalog records, which is particularly useful when guidance applies to an entire collection or a type of item within a collection. When cultural care information or a rights record is linked to a catalog record, the CCN icons are activated and appear next to the thumbnail image at the top of the catalog.

Inside collections housing areas, staff have attached CCNs to housing mounts. CCNs are printed as a report from the CIS and inserted into mylar sleeves adhered to mounts with double-sided tape. NMAI chose mylar sleeves over stickers so that CCNs can be swapped out or changed without damaging archival board mounts. This allows staff to easily and quickly update CCNs as guidance changes and grows (fig. 1).



Fig. 1. CCNs are put in mylar sleeves and secured to mounts using double-sided tape. They are placed within the line of sight of barcodes or catalog numbers to ensure they are visible to staff. Two different sizes of mylar sleeves are used to accommodate the CCNs on both large and small mounts.

Looking Toward the Future

Cultural care is not a project with start and end dates but an ongoing process. NMAI has implemented hundreds of protocols or guidelines to tens of thousands of items in its care, but the work is not done. This institution represents over a thousand communities across the Western Hemisphere, and there are items in the collection that have not yet been consulted on. NMAI staff believe that some of these items may have protocols or guidelines associated with them and have added CCN placeholders to the records until a systematic collections review can take place. As NMAI continues to develop new relationships, these placeholders will be replaced with direct guidance from communities and Tribes.

Additionally, there is a need to revisit some of the guidance that was previously provided. Items, communities, and our relationships to each other are living, growing, and changing. The way we work also changes as new tools, techniques, and technologies are developed. As such, cultural care guidance needs to be revisited, discussed, and updated periodically. NMAI has a desire to connect with partners again to review and update existing guidance.

It is NMAI's hope that other institutions consider adopting CCNs into their own systems of documenting cultural care guidance. If adopted widely, CCNs could act as a universal code, making it easy for Tribes, communities, researchers, artists, and museum professionals to identify guidelines and protocols across museums and cultural institutions.

[CCNs and the user guide](#) are available online for free on the Local Contexts website.

Pinguat (Beads)

Amanda Lancaster

Curator of Collections, Alutiiq Museum & Archaeological Repository

The Kodiak Archipelago is a large, windswept group of islands in the Gulf of Alaska. This remote region is home to the Alutiiq/Sugpiaq people. For over seventy-eight hundred years members of the Alutiiq Nation have lived across the archipelago northwest to the Alaska Peninsula and eastward across the Kenai Peninsula and Prince William Sound. A coastal homeland led to a maritime lifestyle—one that imparted a long, enduring tradition of harvesting marine resources and using them to create clothing, tools, boats, and more. The Alutiiq were among the first Alaska Native people to experience European contact in the eighteenth century. A rapid, brutal period of conquest brought colonizers, traders, and naturalists to their homeland and resulted in losses of economic sovereignty, cultural traditions, and thousands of lives. One of the least known outcomes of this clash of cultures is the creation of ethnographic collections.

Europeans collected cultural belongings from the Alutiiq through trade, commission, and even theft. These belongings—including gutskin parkas, carved wooden masks, beaded regalia, kayak models, throwing boards, hunting and fishing gear, and much more—spread across the world, to American, British, Finnish, French, German, and Russian collectors. Many ended up in museums, and that is how three sets of beaded regalia made their way to the Musée de Boulogne-sur-Mer in the north of France. A nineteen-year-old French anthropologist named Alphonse Pinart collected the regalia while kayaking around the Kodiak Archipelago in 1871–72 and donated the pieces to his local museum.

The Alutiiq Museum began as a series of cultural programs in 1987, focusing on Alutiiq arts, language, and history. It opened to the public in 1995 and is dedicated to preserving and sharing Alutiiq history and culture. Since that time, the Alutiiq Museum has cultivated a successful and fruitful partnership with our French museum colleagues, and members of the Alutiiq community began reconnecting with the Musée de Boulogne-sur-Mer collection in the late 1990s. Following a series of transcontinental loans and exhibitions of Alutiiq treasures, the Alutiiq Museum proposed to borrow and study a rare set of beaded regalia—a headdress, stole, and cuffs—and use it to study and invigorate beading practices. This culminated in the *Pinguat* (Beads) project, centered around a three-year loan of the regalia. A group of Alutiiq beaders would spend time with the ancestral pieces, study their construction, take notes, and create replicas. When the historic pieces were returned to France, the replicas would remain in Kodiak.

The regalia arrived in July 2018. It was displayed in the Alutiiq Museum gallery, the first time the ancestral beaded regalia had been seen in Kodiak in almost 150 years. The museum began assembling a group of beaders—an experienced team leader and twelve assistants—and over fifty people applied for one of the thirteen spots. The museum selected those with a strong desire to learn, some arts experience, and a demonstrated commitment to sharing cultural knowledge. The team of Alaska Native women met at the museum for a week-long workshop in November 2019, which included a public beading event where visitors watched beaders at work and created their own three-strand bracelets.

The beading team had unrestricted access to the regalia during the week of the workshop. With the permission of the Musée de Boulogne-sur-Mer, the display cover was removed so they could study the regalia up close. They counted the individual beads and gently examined the construction of the pieces. Videographer Joshua Branstetter

documented the workshop and interviewed each participant to capture their experiences.¹

The beaders' assignment was to create a replica of the four pieces on loan—a headdress, a pair of cuffs, and what was originally thought to be a dance belt but which, upon examination, the beaders determined was actually a stole to be worn around the shoulders. They also found that the bead strands were tied to the cap of the headdress in a way that none of them had ever seen. This information was shared with the Musée de Boulogne-Sur-Mer.

The presence of the ancestral regalia generated a wave of creativity among the talented beaders, who went far beyond what the museum had requested. They created the replica regalia but then kept working, making a second set for the museum's hands-on collection. The headdress for that set was intentionally left incomplete so it could be used as a training tool. The beaders, referencing photos, also used leftover supplies to re-create an ancestral beaded necklace currently housed in the Smithsonian, as well as a set of earrings and a bracelet. Three other members of the team were also talented painters, and they documented the workshop with a set of watercolors.

The results of the workshop were immense: The Alutiiq Museum has a near exact replica of the ancestral set of regalia, another set for a teaching collection, additional pieces of regalia, watercolors, and a professional documentary film about the process, as well as a set of professional photos of the ancestral pieces and a pattern book that documents the construction of the headdress.² The Musée de Boulogne-sur-Mer gained useful information about the regalia in their care from cultural experts, and the partnership between the two museums was strengthened. In fact, when Alutiiq Museum staff members couriered

the regalia back to France, they provided beading instructions to the French staff while the documentary played in the background.

However, one of the most impactful legacies of the *Pinguat* project was the wave of beading that followed. The project's success led the museum to develop and host more beading workshops for cuffs, bracelets, earrings, and headdresses. The COVID-19 pandemic pushed the museum toward virtual classes, which encouraged staff to create digitally accessible instructions—video tutorials and written directions—to reach more people than ever before. The Alutiiq diaspora stretches across Alaska and the United States, and now everyone could access heritage activities no matter where they lived.

In May 2025, after a two-year building renovation, the Alutiiq Museum celebrated a grand reopening that featured a week of cultural activities. One of the main events was a regalia pageant, where community members were invited to wear the parkas, jewelry, and beaded regalia they created over the last several years, with help from museum programs. The *Pinguat* project's influence on this event is indisputable.

This project demonstrates that partnerships like the one between the Alutiiq Museum and the Musée de Boulogne-sur-Mer are rich with possibility, and it created a template for hosting and sharing cultural arts workshops that can be used by the Alutiiq Museum far into the future. Even though the ancestral pieces were returned to France, the ancestral knowledge they hold will remain in Kodiak forever—in detailed photographs, in replicas, and in the artists who studied them.

The *Pinguat* project was a partnership between the Alutiiq Museum, Musée de Boulogne-sur-Mer, and the Sun'aq Tribe of Kodiak. It was funded by the United States Bureau of Indian Affairs, Alaska Region and Koniag.

1 Branstetter's resulting film, *Pinguat*, was nominated for best documentary short at the American Indian Film Institute in 2020 and was an official selection at the NatiVisions Film Festival that same year. In 2021, it received a special mention from the Impact Docs Awards and won the Made in Alaska Grand Jury Prize at the Anchorage International Film Festival.

2 See the [headdress \(nacaq\) pattern book](#) on the Alutiiq Museum website.

Stockbridge-Munsee Community's NAGPRA Database: A Method of Recordkeeping for the Future

Sara Restrepo

Program Coordinator, Stockbridge-Munsee Community Tribal Historic Preservation Office

The Stockbridge-Munsee Community Band of Mohican Indians has been actively involved in NAGPRA conversations and repatriations since the mid-1990s, when an official position was created to handle all inquiries and communications from museums. A variety of databases and recordkeeping had been used since then, resulting in multiple spreadsheets, different color-coding systems, and duplicated data spread across paper records, emails, and scanned correspondence. The system relied heavily on individual staff memory and knowledge, records were updated inconsistently, and reports were difficult to generate. Large, overview questions, such as how many ancestors had been repatriated since 1993, or which priority cases were waiting to be addressed, could not easily be answered.

In 2023, the Tribal Historic Preservation Office (THPO) applied for and received a National Park Service Consultation/Documentation grant, with the purpose of designing a database to help address these issues. The idea was to create a comprehensive database that was easy to use and easy to update—one that could be opened by someone new to the office who would be able to see what had been done and what was left to do. It was also important that the database be adaptable, and in a format/program that was not likely to become obsolete. We contracted with Jennifer Haas, director and NAGPRA coordinator of the Archaeological Research Laboratory Center,

University of Wisconsin-Milwaukee, and chose to code the database in Microsoft Excel using Visual Basic.

The result is a comprehensive, thought-to-be-complete database that can include non-NAGPRA and private donations, and can track duty of care requests and obligations under the 2023 NAGPRA regulations. We created a user manual and glossary to help new users orient themselves with internal definitions and coding procedures. The database development process and a sample version of the database were presented at the 2024 National Association of Tribal Historic Preservation Officers conference.¹ In the spirit of collaborative partnerships, the Stockbridge-Munsee THPO staff felt it important to share this database with other Tribal Nations, and the sample template of the database—alongside sample versions of the user manual and glossary—were uploaded to the NAGPRA Community of Practice's [Google Drive](#).

While the database was formatted with the needs of Tribal Nations in mind, the malleability of the Excel and Visual Basic format means that it could be adjusted for museums. Everyone is encouraged to watch the presentation and interact with the database, to see if it might fit the needs of their institution.

¹ You can access the “[Databases and Data on Places: How We Gained Intellectual Control of Our NAGPRA Files](#)” presentation on YouTube. Speakers are Bonney Hartley, program manager, Stockbridge-Munsee Community; Jennifer Haas, director and NAGPRA coordinator of the Archaeological Research Laboratory Center, University of Wisconsin-Milwaukee; and Sara Regensburger, program coordinator, Stockbridge-Munsee Community. The presentation begins at 6:34:05 min.

Institutional and Tribal Partnerships: 3D Models of Artifacts and Collections

Sarah Shepard

Registrar/Collections Manager, NAGPRA Coordinator, Arkansas Archeological Survey

The Arkansas Archeological Survey (ARAS) has created a digital archive of three-dimensional (3D) scans of selected artifacts and collections. Objects associated with mortuary contexts are not scanned without Tribal consent. Questions arise because certain types of objects may be funerary, but documentation may be absent or insufficient for association with a burial context. Private donations and transfers from other institutions often do not include field records, notes, or other kinds of documentation that describe the object's origin or its provenance over time, creating an ethical dilemma for scanning.

In 2023, ARAS staff spoke with Betty Gaedtke, a Quapaw Nation Tribal member, about scanning objects that are not definitively funerary. Examples from northeast Arkansas include “head pots.” These late Mississippian vessels depict a human head, often with closed eyes, pierced ears, and incised lines on the face, and are finished with red and white paint. The vessels are largely in private collections and lack detailed provenience information, although some can be associated with

a specific site. Gaedtke, an accomplished artist and potter, created an original version of a head pot and donated that vessel for education and outreach use at ARAS (fig. 1).

ARAS staff scanned the donated vessel (fig. 2), which will allow for the creation of 3D-printed copies that can be refinished to approximate an ancient head pot. Staff use the scans and 3D-printed objects to discuss the interpretation of the head pot and its significance to Native American and Quapaw history. We also use it to explain the origin of the vessel and how it came to be in ARAS collections, and we discuss the need for a thorough consideration of the context and provenience of artifacts, as well as the importance of looking beyond what is verified through “documentation.” Discussing the limitations of collections, private donations, field and collection documentation, and the lack of association of objects can lead to strengthened partnerships and creative approaches that are mutually beneficial for education and outreach.



Fig. 1. Vessel made by Betty Gaedtke (Quapaw Nation) in 2023.

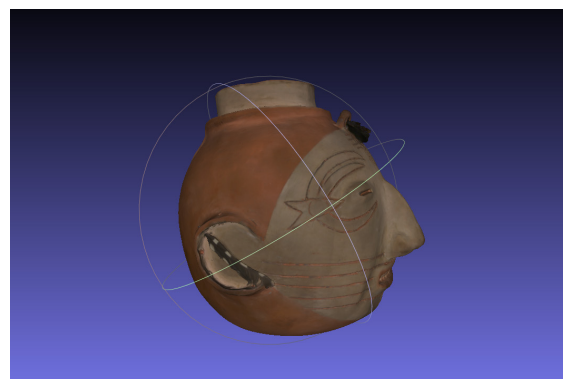


Fig. 2. Scanned image of donated vessel.

History Colorado and Long-Term Tribal Loans

Chance Ward

(Lakota—Cheyenne River Sioux Tribe)

NAGPRA Coordinator, History Colorado

History Colorado has long observed ethical and respectful stewardship in its collections practice. History Colorado is a state agency with a network of eleven museums and sites in Colorado. It is the steward of about fifteen million objects, photographs, and archival resources, which it preserves, studies, and shares through exhibitions and other programs. We follow current best practices, and we have always been open about continuing care for objects that have been returned or are in the process of being returned to Tribes. We have ongoing relationships, including yearly consultations, with our Tribal partners, and they have discussed with us the status of their capacities and capabilities to store their collections. Because it takes both time and money to construct Tribal museums and cultural centers that include collections spaces, Tribes may prefer that an item or belonging remain where it is currently housed until an alternative can be determined. To support and maintain reciprocal relationships with our Tribal partners, History Colorado developed a formal “long-term Tribal loan” policy and added it to its existing collections management policies. When this new policy was brought to the board of directors for formal review and approval, there was no resistance, no pushback, no asking why, because the board understood the history that Tribal Nations have had with museums.

At History Colorado, we collaborate with our partner Tribes regularly. They provide their expertise, knowledge, and assistance with NAGPRA, collections, oral histories, exhibit development, education, programming, and state historical-fund grants and projects. The long-term Tribal loan agreement is essential to continuing and maintaining reciprocal relationships.

History Colorado has a good relationship with the Northern Arapaho Tribe. The loan agreement helps us continue our repatriation work to regain possession of our items without the pressure to find a space for them right away. The Northern Arapaho Tribe is currently in the process of building more space to house items. This loan agreement shows museums are working in good faith with tribes.

—Northern Arapaho Tribal Historic Preservation Office



One case study involves the repatriation of a cultural item by History Colorado in 2025. The lineal descendants consulted with our staff and determined that the item would remain in History Colorado's physical care until a future date. This is the first repatriated item to formally have a long-term loan agreement with us. The descendants retain full legal control and ownership of the item, while History Colorado has physical custody and stewardship. NAGPRA's Duty of Care still applies, and the lineal descendants provided their protocols on access, restrictions, handling, and cultural care requirements, which History Colorado will follow. The descendants will be consulted first about any research requests for use and/or access. If they say no, we will deny the request. If they say yes, we will ensure their restrictions, handling, and care requirements are met. The descendants can take physical possession at any time, and they also have the option to renew the two-year agreement. We chose a two-year period so that History Colorado staff maintains contact and relationships with the lineal descendants.

Because History Colorado has such well-established Tribal relationships, our caretaking role has expanded to include cultural items that fall outside NAGPRA's purview. Our long-term Tribal loans honor direction from the items' rightful owner, whether the owners are lineal descendants or the Tribe.

Bibliography

- American Association of Physical Anthropologists. **"Code of Ethics of the American Association of Physical Anthropologists."** American Association of Physical Anthropologists, 2003.
- Balachandran, Sanchita, and Kelly McHugh. **"Respectful and Responsible Stewardship: Maintaining and Renewing the Cultural Relevance of Museum Collections."** In *Preventive Conservation: Collection Storage*, edited by Lisa Elkin and Christopher Norris. Society for the Preservation of Natural History Collections, 2009.
- Benden, Danielle M., and Mara C. Taft. **"A Long View of Archaeological Collections Care, Preservation, and Management."** *Advances in Archaeological Practice* 7, no. 3 (2019): 217–23. https://www.researchgate.net/publication/335348356_A_Long_View_of_Archaeological_Collections_Care_Preservation_and_Management
- Bernstein, Bruce. **"Collaborative Strategies for the Preservation of North American Indian Material Culture."** *Journal of the American Institute for Conservation* 31, no. 1 (1992): 23–29.
- Bird, Johannah. **"Indigenous Relational Methodologies and Archives."** *Transactions of the American Philosophical Society* 113, no. 1 (2024): 41–59.
- Brown, Michael F. ***Who Owns Native Culture?*** Harvard University Press, 2003.
- Bryant, Laura, Marla Taylor, and Laura Elliff Cruz. **"Reconsidering Institutional Research Policies on Indigenous Collections."** *Advances in Archaeological Practice* (July 2025): 1–9. <https://doi.org/10.1017/aap.2025.11>
- Canadian Conservation Institute. ***Preserving Aboriginal Heritage: Technical and Traditional Approaches.*** Proceedings of Symposium 2007. Canadian Heritage, 2008. <https://publications.gc.ca/site/eng/9.806938/publication.html>
- Canadian Museum of Civilization, Commonwealth Association of Museums, and the University of Victoria. ***Curatorship: Indigenous Perspectives in Post-Colonial Societies: Proceedings.*** Mercury Series / La Collection Mercure. University of Ottawa Press, 1996.
- Cassman, Vicki, Nancy Odegaard, and Joseph Powell, eds. ***Human Remains: Guide for Museums and Academic Institutions.*** AltaMira Press, 2007.
- Chapman, Rebecca, and Rebecca Plevel. **"Indigenous Copyright Concepts and Indigenous Data Sovereignty: How Libraries and Archives Can Support It."** *Law Library Journal* 116, no. 4 (2024): 323–67. https://www.aallnet.org/wp-content/uploads/2024/10/LLJ_116n4_FINAL.pdf
- Clavir, Miriam. **"Preserving Conceptual Integrity: Ethics and Theory in Preventive Conservation."** In *Preventive Conservation Practice, Theory and Research: Preprints of the Contributions to the Ottawa Congress, 12–16 September 1994*, edited by Ashok Roy and Perry Smith. International Institute for Conservation of Historic and Artistic Works, 1994.
- Clavir, Miriam. ***Preserving What Is Valued: Museums, Conservation, and First Nations.*** UBC Press, 2002.
- Colwell, Chip. **"Can Repatriation Heal the Wounds of History?"** *The Public Historian* 41, no. 1 (2019): 90–110.
- Colwell, Chip. ***Plundered Skulls and Stolen Spirits: Inside the Fight to Reclaim Native America's Culture.*** University of Chicago Press, 2017.
- Cotter, Suzanne. **"Museums as Agents of Change: The Importance of Sharing Outstanding Practices."** International Council of Museums, 2025. <https://icom.museum/en/news/museums-as-agents-of-change-the-importance-of-sharing-outstanding-practices/>
- Davy, Jack. ***Native Americans in British Museums.*** Elements in Critical Heritage Studies. Cambridge University Press, 2021. Includes historical background and collections-related sections in dialogue.
- Deer, Melanie, Angela Garcia-Lewis, Amanda Lancaster, Martin Schultz, and Reylynne Williams. **"Evolving Standards: Incorrect Cultural Care as an 11th Agent of Deterioration."** *Museum* (American Alliance of Museums), posted September 21, 2025.
- Deloria, Philip. **"The New World of the Indigenous Museum."** *Daedalus* (Spring 2018): 106–15.
- Drumheller, Ann, and Marian Kaminitz. **"Traditional Care and Conservation: The Merging of Two Disciplines at the National Museum of the American Indian."** In *Preventive Conservation Practice, Theory and Research: Preprints of the Contributions to the Ottawa Congress, 12–16 September*

- 1994, edited by Ashok Roy and Perry Smith. International Institute for Conservation of Historic and Artistic Works, 1994.
- Durate, Marisa Elena, and Miranda Belarde Lewis. **"Imagining: Creating Spaces for Indigenous Ontologies."** *Cataloging and Classification Quarterly* 53, no. 5-6 (2015): 677-702.
- Fforde, Cressida, Jane Hubert, and Paul Turnbull, eds. ***The Dead and Their Possessions: Repatriation in Principle, Policy, and Practice***. Routledge, 2002.
- Fine-Dare, Kathleen S. ***Grave Injustice: The American Indian Repatriation Movement and NAGPRA***. University of Nebraska Press, 2002.
- First Nations Information Governance Centre. ***Ownership, Control, Access and Possession (OCAP): The Path to First Nations Information Governance***. First Nations Information Governance Centre, 2014. https://achh.ca/wp-content/uploads/2018/07/OCAP_FNIGC.pdf
- Flynn, Gillian A., and Deborah Hull-Walski. **"Merging Traditional Indigenous Curation Methods with Modern Museum Standards of Care."** *Museum Anthropology* 25, no. 1 (2001): 31-40.
- Ganze, Michelle, and Veronica L. Denison, eds. ***A Practical Guidebook to Trauma-Informed Archival Practice: Best Practices and Case Studies***. Bloomsbury Publishing, 2026.
- Garland, Carey J., Dawn Marie Alapisco, Risa Arbolino, Lauren Sieg, Amy Covell-Murthy, Briece Edwards, and Jessica Yann. **"Considerations for Developing Collaborative Policies on NAGPRA, Repatriation, and the Care of Ancestors and Cultural Items."** *Advances in Archaeological Practice* (November 2025): 394-408. <https://doi.org/10.1017/aap.2025.10079>
- Haas, Jennifer R., Brooke Morgan, Ellen Lofaro, Jayne-Leigh Thomas, Sarah O'Donnell, Nina M. Schreiner, and Miranda Panther. **"NAGPRA in Archaeological Practice: Implementing Duty of Care."** *Advances in Archaeological Practice* 13, no. 3 (2025): 1-11. <https://doi.org/10.1017/aap.2025.14>
- Harris, Clare, and Michael O'Hanlon. **"The Future of the Ethnographic Museum."** *Anthropology Today* 29, no. 1 (2013): 8-12.
- Institute of Museum and Library Services. ***Connecting to Collections: A Report to the Nation***. September 2010. https://www.imls.gov/sites/default/files/publications/documents/ctocreport_0.pdf
- Isaac, Gwyneira. ***Mediating Knowledges: Origins of a Zuni Tribal Museum***. Smithsonian Institution Press, 2007.
- Johnson, Jessica, Susan Heald, Kelly McHugh, Elizabeth Brown, and Marian Kaminitz. **"Practical Aspects of Consultation with Communities."** *Journal of the American Institute for Conservation* 44, no. 3 (2005): 203-15.
- Jones, Anna Laura. **"Exploding Canons: The Anthropology of Museums."** *Annual Review of Anthropology* 22 (1993): 201-20.
- Kakaliouras, Ann M. **"An Anthropology of Repatriation: Contemporary Physical Anthropological and Native American Ontologies of Practice."** *Current Anthropology* 53, no. S5 (2012): S210-S221.
- Kowal, Emma, Laura S. Weyrich, Juan Manuel Argüelles, Alyssa C. Bader, Chip Colwell, Amanda Daniela Cortez, Jenny L. Davis, Gonzalo Figueiro, Keolu Fox, Ripan S. Malhi, Elizabeth Matisoo-Smith, Ayushi Nayak, Elizabeth A. Nelson, George Nicholas, Maria A. Nieves-Colón, Lynette Russell, Sean Ulm, Francisco Vergara-Silva, Fernando A. Villanea, Jennifer K. Wagner, Joseph M. Yracheta, and Krystal S. Tsosie. **"Community Partnerships Are Fundamental to Ethical Ancient DNA Research."** *Human Genetics and Genomics Advances* 4, no. 2 (2023). [https://www.cell.com/hgg-advances/fulltext/S2666-2477\(22\)00078-1](https://www.cell.com/hgg-advances/fulltext/S2666-2477(22)00078-1)
- Kreps, Christina. **"Non-Western Models of Museums and Curation in Cross-Cultural Perspective."** In *A Companion to Museum Studies*, edited by Sharon Macdonald. Blackwell Publishing, 2006. https://www.researchgate.net/publication/229544027_Non-Western_Models_of_Museums_and_Curation_in_Crosscultural_Perspective
- Lewis, Kara. **"Toward Centering Indigenous Knowledge in Museum Collections Management Systems."** *Collections: A Journal for Museum and Archives Professionals* 20, no. 1 (2024). <https://journals.sagepub.com/doi/10.1177/15501906241234046>
- Lonetree, Amy. ***Decolonizing Museums: Representing Native America in National and Tribal Museums***.

University of North Carolina Press, 2012.

- Lukavic, John P., Dakota Hoska, and Christopher Patrello, eds. *Here Now: Indigenous Arts of North America at the Denver Art Museum*. Hirmer Publishers, 2022.
- Malaro, Marie C., Ildiko Pogány DeAngelis, and the Smithsonian's Office of General Counsel. *A Legal Primer on Managing Museum Collections*. 4th ed. Smithsonian Books, 2025.
- Mellor, Stephen P. "The Exhibition and Conservation of African Objects: Considering the Nontangible." *Journal of the American Institute for Conservation* 31, no. 1 (1992): 3–16.
- Mihesuah, Devon A. "Introduction." *American Indian Quarterly* 20, no. 2 (1996).
- Mihesuah, Devon A., ed. *Repatriation Reader: Who Owns American Indian Remains?* University of Nebraska Press, 2000.
- Moreno, Teresa, Chris White, Alyce Sadongei, and Nancy Odegaard. "Integration of Tribal Consultation to Help Facilitate Conservation and Collections Management at the Arizona State Museum." *SAA Archaeological Record* 9, no. 2 (2009): 36–40.
- Museums Australia. *Continuous Cultures, Ongoing Responsibilities: Principles and Guidelines for Australian Museums Working with Aboriginal and Torres Strait Islander Cultural Heritage*. Museums Australia, 2005.
- Museums Victoria. "Cultural Sensitivity Message." Museums Victoria, n.d. <https://collections.museumsvictoria.com.au>
- Nafziger, James A. R. "The Protection and Repatriation of Indigenous Cultural Heritage in the United States." *Willamette Journal of International Law and Dispute Resolution* 14, no. 2 (2006): 175–225.
- National Congress of American Indians. *Tribal Nations and the United States: An Introduction*. National Congress of American Indians. National Congress of American Indians, 2018.
- National Museum of the American Indian Act. **Public Law 101-185, 103 Stat. 1336**. November 28, 1989.
- Native American Rights Fund. *Sacred Grounds: A Right Relations Guidebook on Native Burials and Cultural Items*. 2025. https://static1.squarespace.com/static/659d5efcf461a846b71e078c/t/68e42f172517e70c7928b1da/1759784727955/Sacred+Grounds+Guidebook_LIF_Oct2025.pdf
- O'Neal, Jennifer R. "Indigenizing Research and Archives: Relationality and the Collections Back Movement." *Transactions of the American Philosophical Society* 113, no. 1 (2024): 11–27.
- O'Neal, Jennifer R. "Introduction: Indigenous Studies in Archives and Beyond: Relationships, Reciprocity, and Responsibilities." *Transactions of the American Philosophical Society* 113, no. 1 (2024): 1–9.
- Odegaard, Nancy, and Alyce Sadongei. *Old Poisons, New Problems: A Museum Resource for Managing Contaminated Cultural Materials*. AltaMira Press, 2005.
- Odegaard, Nancy. "Artists' Intent: Material Culture Studies and Conservation." *Journal of the American Institute for Conservation* 34, no. 3 (1995): 187–93.
- Owczarek, Nina, ed. *Prioritizing People in Ethical Decision-Making and Caring for Cultural Heritage Collections*. Routledge, 2023.
- Pantalony, Rina. "Stewarding Collections in Times of Changing Perspectives: How Traditional Knowledge and Traditional Cultural Expressions Can Facilitate Preservation and Access." *Journal of Copyright in Education and Librarianship* 7, no. 1 (2024).
- Pearlstein, Ellen. "Conserving Indigenous Featherwork: A California Case Study." *GCI Newsletter* (Fall 2021): 16–18.
- Pearlstein, Ellen. "Conserving Ourselves: Embedding Significance into Conservation Decision-Making in Graduate Education." *Studies in Conservation* 62, no. 8 (2016).
- Peers, Laura, and Alison K. Brown, eds. *Museums and Source Communities: A Routledge Reader*. Routledge, 2003.
- Pitblado, Bonnie L., Suzie Thomas, Anna Wessman, and Sophie Woodward. "Retheorizing Archaeological 'Artefacts' as 'Belongings'." *Archaeologies: Journal of the World Archaeological Congress* 21 (2025): 209–29. <https://link.springer.com/article/10.1007/s11759-025-09523-1>
- Preucel, Robert W. *Archaeological Semiotics*. Blackwell Publishing, 2006. <https://circulosemiotico.wordpress.com/wp-content/uploads/2018/09/preucel-robert-archaeological-semiotics.pdf>

- Raphael, Monica Jo, and Mary Deleary, eds. *In the Company of Our Relatives*. Eiteljorg Museum of American Indians and Western Art, 2025.
- Riding In, James, Cal Seciwa, Suzan Shown Harjo, and Walter Echo-Hawk. “Protecting Native American Human Remains, Burial Grounds, and Sacred Places: Panel Discussion.” *Wicazo Sa Review* 19, no. 2 (2004): 169–83. <https://www.jstor.org/stable/1409506>
- Rosoff, Nancy B. “Integrating Native Views into Museum Procedures: Hope and Practice at the National Museum of the American Indian.” *Museum Anthropology* 22, no. 1 (1998): 33–42.
- Rothstein, Edward. “Museum Review: The Indian Museum, from a Native Perspective.” *New York Times*, September 21, 2004.
- Ryker-Crawford, Jessie. “Re-Adjusting Museum Theoretics (and Hence, Practices) to Include Indigenous Community Needs and Values.” *Museology in Tribal Contexts*. ICOFOM Study Series 49-1, 2021. <https://journals.openedition.org/iss/3394>
- Ryker-Crawford, Jessie. “Towards an Indigenous Museology: Native American and First Nations Representation and Voice in North American Museums.” PhD diss., University of Washington, Seattle, 2017.
- Salvatore, Cecilia Lizama, ed. *Cultural Heritage Care and Management: Theory and Practice*. Rowman and Littlefield Publishers, 2018.
- Schug, Gwen Robbins, Siân E. Halcrow, and Carlina de la Cova. “They Are People Too: The Ethics of Curation and Use of Human Skeletal Remains for Teaching and Research.” *American Journal of Biological Anthropology* 186, no. 2 (2025). <https://doi.org/10.1002/ajpa.70013>
- Shannon, Jennifer A. “Collections Care Informed by Native American Perspectives: Teaching the Next Generation.” *Collections: A Journal for Museum and Archives Professionals* 13, no. 3/4 (2017): 205–24.
- Shannon, Jennifer A. *Posterity Is Now: Practicing Museum Anthropology, Collections Care, and Collaborative Research with Indigenous Peoples*. University of Wyoming Press, 2025.
- Simpson, Moira G. *Making Representations: Museums in the Post-Colonial Era*. Routledge, 2001.
- Sleeper-Smith, Susan, ed. *Contesting Knowledge: Museums and Indigenous Perspectives*. University of Nebraska Press, 2009.
- Spears, Loren, and Amanda Thompson. “‘As We Have Always Done’: Decolonizing the Tomaquag Museum’s Collections Management Policy.” *Collections: A Journal for Museum and Archives Professionals* 18, no. 1 (2022): 31–41.
- Starrenburg, Sophie. “Final Report of the ILA Committee on Participation in Global Cultural Heritage Governance.” *International Journal of Cultural Property* 30, no. 2 (2023): 230–44. <https://doi.org/10.1017/S0940739123000097>
- Sullivan, Lawrence E., and Alison Edwards, eds. *Stewards of the Sacred*. American Association of Museums in cooperation with the Center for the Study of World Religions, Harvard University, 2004.
- Te Papa Tongarewa / Museum of New Zealand. *Developing Your Collection: Acquisition and Deaccession Policies*. Te Papa Tongarewa / Museum of New Zealand, 2003.
- Thomas, David Hurst. *Skull Wars: Kennewick Man, Archaeology, and the Battle for Native American Identity*. Basic Books, 2000.
- Tribal Legal Development Clinic, UCLA School of Law. “The Need for Confidentiality within Tribal Cultural Resource Protection.” UCLA School of Law, Native Nations Law and Policy Center. December 2000. [https://law.ucla.edu/sites/default/files/PDFs/Native_Nations/239747 UCLA Law publications Confidentiality_R2_042021.pdf](https://law.ucla.edu/sites/default/files/PDFs/Native_Nations/239747_UCLA_Law_publications_Confidentiality_R2_042021.pdf)
- Tuck, Eve, and K. Wayne Yang. “Decolonization Is Not a Metaphor.” *Decolonization: Indigeneity, Education, and Society* 1, no. 1 (2012): 1–40.
- Turner, Hannah. *Cataloguing Culture: Legacies of Colonialism in Museum Documentation*. UBC Press, 2020.
- United Nations. *Return or Restitution of Cultural Property to the Countries of Origin: Note by the Secretary-General, A/58/314*. 25 August 2003. <https://digitallibrary.un.org/record/502765?ln=en&v=pdf>

- United Nations. **Return or Restitution of Cultural Property to the Countries of Origin: Report of the Secretary-General, A/56/413.** United Nations, 27 September 2001.
- United Nations Educational, Scientific and Cultural Organization (UNESCO). **Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property.** 14 November 1970. <https://unesdoc.unesco.org/ark:/48223/pf00000133378>
- United Nations Educational, Scientific and Cultural Organization (UNESCO). **Convention on the Protection of the Underwater Cultural Heritage,** November 2, 2001. In *Records of the General Conference, 31st Session, Paris, 15 October to 3 November 2001, Volume 1: Resolutions, 31 C/Resolutions + CORR.* <https://unesdoc.unesco.org/ark:/48223/pf0000124687.page=56>
- United Nations Educational, Scientific and Cultural Organization (UNESCO). **Convention for the Safeguarding of the Intangible Cultural Heritage.** 17 October 2003. In *Basic Texts of the 2003 Convention for the Safeguarding of the Intangible Cultural Heritage*, 2024 ed. UNESCO. CLT-2024/WS/3; CLD-459_24. https://ich.unesco.org/doc/src/2003_Convention_Basic_Texts_2024_version_EN.pdf
- United Nations Educational, Scientific and Cultural Organization (UNESCO). **Records of the General Conference, 20th Session, Paris, 24 October to 28 November 1978, Volume 1: Resolutions,** 20 C/Resolutions + CORR. UNESCO, 1979.
- United States Department of the Interior. **Native American Graves Protection and Repatriation Act Systematic Processes for Disposition or Repatriation of Native American Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony.** Federal Register, 88(238), 86452–86539. (Codified at 43 CFR pt. 10). 2023.
- Van Alst, Emily C., and Carlton Shield Chief Gover, eds. **Indigenizing Archaeology: Putting Theory into Practice.** University Press of Florida, 2024.
- Ward, Chance, Jimmy Arterberry, Joseph Aguilar, Natalie Patton, Christina Cain, Emily Lena Jones, and William Timothy Treal Taylor. **“Toward Legal, Ethical, and Culturally Informed Care of Animal Remains in American Museum Collections.”** *Advances in Archaeological Practice* (March 2025): 416–23. <https://doi.org/10.1017/aap.2024.25>
- Watkins, Joe. **Indigenous Archaeology: American Indian Values and Scientific Practice.** AltaMira Press, 2000.
- Watson, James T., Aaron J. Young, Angela Garcia-Lewis, Cristin Lucas, and Shannon Plummer. **“Respectful Terminology in Archaeological Compliance.”** *Advances in Archaeological Practice* 10, no. 2 (2022): 140–48. <https://doi.org/10.1017/aap.2021.47>
- Welsh, Elizabeth, Catherine Sease, Basil Rhodes, Steven C. Brown, and Miriam Clavir. **“Multicultural Participation in Conservation Decision-Making.”** *WAAC Newsletter* 14, no. 1 (1992): 13–22.
- Wheeler, Ryan, Jaime Arsenault, and Marla Taylor. **“Beyond NAGPRA/Not NAGPRA.”** *Collections: A Journal for Museum and Archives Professionals* 18, no. 1 (2022): 8–17.
- White, Elroy (Óíxitasu), Kyle A. Artelle, Ed Brown (Húmpas Áúxv), Kelly Brown (Ááqvamut), Diana E. Chan, and William Housty (Dúqváísla). **“Mn.úxv?it Model for Centering Indigenous Knowledge and Governance.”** *Conservation Biology* 38, no. 6 (2024). <https://conbio.onlinelibrary.wiley.com/doi/epdf/10.1111/cobi.14398>
- Williams, Lucy Fowler, William Wierzbowski, and Robert W. Preucel, eds. **Native American Voices on Identity, Art, and Culture: Objects of Everlasting Esteem.** University of Pennsylvania Museum of Archaeology and Anthropology, 2005.
- World Intellectual Property Organization. **Traditional Knowledge and Intellectual Property: Background Brief 1.** World Intellectual Property Organization, 2023. <https://www.wipo.int/edocs/pubdocs/en/wipo-pub-rn2023-5-1-en-traditional-knowledge-and-intellectual-property.pdf>

Additional References

Case Studies

- Alutiiq Museum. **“Beading.”** <https://alutiiqmuseum.org/alutiiq-people/art/arts-blog/beading/>
- Alutiiq Museum. **“Sewing.”** <https://alutiiqmuseum.org/alutiiq-people/art/arts-blog/sewing/>
- Danyluk, Stephanie, and Rebecca MacKenzie. ***Moved to Action: Activating UNDRIP in Canadian Museums. A Response to the Truth and Reconciliation Commission’s Call to Action #67.*** Canadian Museums Association, 2022. https://museums.ca/uploaded/web/TRC_2022/Report-CMA-MovedToAction.pdf
- Hollinger, Eric. **“Smithsonian Uses 3D Tech to Restore a Broken Sacred Object for Tlingit Indians.”** *SI Digi Blog* (blog). National Museum of Natural History, Smithsonian Institution, September 23, 2019. <https://dpo.si.edu/blog/smithsonian-uses-3d-tech-restore-broken-sacred-object-tingit-indians>
- Smith, Landis, Kelly McHugh, and Michele Austin-Dennehy. **“An Integrated Approach to the Conservation of Cultural Collections.”** In *Engaging Conservation: Collaboration Across Disciplines*, edited by Nina Owczarek, Molly Gleeson, and Lynn A. Grant. Archetype, 2017.

Forms and Templates

- Hopi Cultural Preservation Office, Hopi Tribe. **“Protocol for Research, Publication and Recordings: Motion, Visual, Sound, Multimedia and other Mechanical Devices.”** <https://www.hopi-nsn.gov/wp-content/uploads/2021/09/HCPPO-Research-Protocol.REVISED.2021.pdf>
- Nez Perce Tribe. **“Research Permit Sign-Off Sheet”** and associated documents. <https://nezperce.org/wp-content/uploads/2019/01/research-permit-form.pdf>
- Peabody Museum of Archaeology and Ethnology. **“Engage with Collections.”** <https://peabody.harvard.edu/engage-with-collections>
- Poeh Cultural Center and the National Museum of the American Indian, Smithsonian Institution. **“Agreement for Shared Stewardship of the Di Wae Powa Collection.”** Poeh Cultural Center and the National Museum of the American Indian, Smithsonian Institution, 2024. <https://poehcenter.org/wp-content/uploads/2024/05/Shared-Stewardship-Agreement.pdf>
- Stockbridge-Munsee Community Historic Preservation Office, Stockbridge-Munsee Band of Mohican Indians. **“Archaeological Ethics for Field Schools.”** <https://mohican-nsn.gov/wp-content/uploads/2025/07/archaeological-ethics-for-field-schools.pdf>
- United Auburn Indian Community. **“Tribal Preservation.”** <https://www.auburnrancheria.com/programs-services/tribal-preservation/>

Policies and Procedures

- American Philosophical Society. **“The American Philosophical Society: Protocols for the Treatment of Indigenous Materials.”** *Proceedings of the American Philosophical Society* 158, no. 4 (2014): 411–20. <https://www.amphilsoc.org/sites/default/files/2017-11/attachments/APS%20Protocols.pdf>
- Assembly of First Nations. ***First Nations Cultural Heritage Law and Policy Framework. Assembly of First Nations.*** Assembly of First Nations, 2020.
- Association of Tribal Archives, Libraries and Museums. **“Going Home: Returning Material Culture to Native Communities”** and **“Going Home Fund.”** <https://www.atalm.org/programs/current-programs/going-home-returning-material-culture-to-native-communities/>
- Belgian Advisory Committee on Bioethics. ***Opinion no. 82 of 9 January 2023 on the Status of Human***

Remains in Museum, Scientific and Private Collections. https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_theme_file/opinion_82_web.pdf

- British Museum, London. *Guidance for the Care of Human Remains in Museums.* Department for Culture, Media and Sport, 2019. <https://www.britishmuseum.org/sites/default/files/2019-11/DCMS-Guidance-for-the-care-of-human-remains-in-museum.pdf>
- German Museums Association. *Guidelines: Care of Human Remains in Museums and Collections.* German Museums Association, 2021. <https://www.museumsbund.de/wp-content/uploads/2021/07/dmb-leitfaden-umgang-menschl-ueherr-en-web-20210625.pdf>
- German Museums Association. *Guidelines for German Museums: Care of Collections from Colonial Contexts.* 3rd ed. German Museums Association, 2021. <https://www.museumsbund.de/wp-content/uploads/2021/03/mb-leitfaden-en-web.pdf>
- Haakanson, Sven D., and Amy F. Steffian. *The Alutiiq Museum's Guidelines for the Spiritual Care of Objects.* 2004. https://www.wipo.int/export/sites/www/tk/en/databases/creative_heritage/docs/alutiiq_guidelines.pdf
- International Council of Museums. *ICOM Code of Ethics for Museums.* International Council of Museums, 2017. <https://icom.museum/wp-content/uploads/2018/07/ICOM-code-En-web.pdf>
- Janke, Terry. *First Peoples: A Roadmap for Enhancing Indigenous Engagement in Museums and Galleries.* Indigenous Roadmap. Australian Museums and Galleries Association, 2018. <https://amaga.org.au/common/Uploaded%20files/Resources/First%20Peoples%20%20A%20roadmap.pdf>
- Karuk Tribe. *"Practicing Pikyav: A Guiding Policy for Collaborative Projects and Research Initiatives with the Karuk Tribe."* Karuk Tribe, 2017. Originally drafted 2008. https://sustainableheritagenetwork.org/system/files/atoms/file/KarukTribe_PracticingPikyav.pdf
- Karuk Tribe. *"Protocol with Agreement for Intellectual Property Rights of the Karuk Tribe: Research, Publication and Recordings."* Karuk Tribe, adopted by Tribal Council on October 23, 2014; amended by Tribal Council on April 23, 2015. <https://sipnuuk.karuk.us/digital-heritage/protocol-karuk-tribe%E2%80%99s-intellectual-property-rights-research-publication-and>
- Museum of Us. *"Physical Anthropology Collection and the Policy on the Curation of Human Remains."* In *Cultural Resources Management Policy*, 7–8. Museum of Us, 2025. <https://cdn.sanity.io/files/2s2oioxu/production/e14fdb02b7b9e2d7f8529a22c43002cb0bc1f1d8.pdf>
- Museum of Us. *"Policy on the Curation of Human Remains at the San Diego Museum of Man, FAQ."* Museum of Us, 2017. <https://museumofus.org/cultural-resources#policy-on-the-curation-of-human-remains>
- National Park Service. *Advancing Co-Stewardship in the National Park Service.* https://www.nps.gov/subjects/policy/upload/Guidance_Advancing_Co-stewardship_NPS_Final_ONAA.pdf
- National Park Service. *Director's Order 71C: Consultation with Indian and Alaska Native Tribes.* Washington, D.C.: Department of the Interior, 2024. https://www.nps.gov/subjects/policy/upload/DO_71C_11-4-2024.pdf
- Rijksmuseum Amsterdam. *Decolonization Policy.* 2024.
- School for Advanced Research. *Standards for Museums with Native American Collections (SMNAC).* <https://sarweb.org/iarc/smnac/>
- Smithsonian Institution, National Museum of Natural History. *Collections Management Policy*, 2024.
- Smithsonian Institution. *Ethical Returns Policy.* Smithsonian Institution, 2018.
- Smithsonian Institution. *"Shared Stewardship and Ethical Returns Policy."* Smithsonian Institution, April 2022. https://ncp.si.edu/sites/default/files/files/Ethical%20Return%20Docs/shared-stewardship-ethical-returns-policy_4.29.2022.pdf
- Society of American Archivists. *Principals in Indigenous Archival Repatriation (PINAR).* <https://www2.archivists.org/sites/all/files/PINAR%20Final%20Version.pdf>
- Society of American Archivists, First Archivists Circle. *Protocols for Native American Archival Materials.* Society of American Archivists, 2007. Revised 2018. <https://www2.archivists.org/standards/protocols-for-native-american-archival-materials>

- Te Papa Tongarewa / Museum of New Zealand. *Taonga Māori Policy*. 2019. <https://www.tepapa.govt.nz/assets/76067/1730769101-collections-policy.pdf>
- United States Department of the Interior. “Chapter 1: Policy and Responsibilities.” 502 DM 1. Office of Policy Analysis, November 30, 2022.
- United States Department of the Interior. “Chapter 4: Department of the Interior Policy on Consultation with Indian Tribes.” 512 DM 4. Office of the Secretary, November 30, 2022.
- United States Department of the Interior. “Chapter 7: Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research.” 301 DM 7. Office of Policy Analysis, December 5, 2023.
- Working Group of the Memorandum of Understanding Regarding Interagency Coordination and Collaboration for the Protection of Indigenous Sacred Sites. *Best Practices for Federal Agencies Regarding Tribal and Native Hawaiian Sacred Sites*. https://www.bia.gov/sites/default/files/media_document/sacred_sites_guide_508_2023-1205.pdf
- Working Group of the Memorandum of Understanding Regarding Interagency Coordination and Collaboration for the Protection of Indigenous Sacred Sites. *Memorandum of Understanding Regarding Interagency Coordination and Collaboration for the Protection of Indigenous Sacred Sites*. <https://www.doi.gov/sites/doi.gov/files/mou-interagency-coordination-and-collaboration-for-the-protection-of-indigenous-sacred-sites-11-16-2021.pdf>

Resources and Professional Development

- Abbe Museum. “When the Wabanaki Thrive, We all Thrive: Abbe Museum’s Sovereignty Guide for Allies.” <https://static1.squarespace.com/static/56a8c7b05a5668f743c485b2/t/6512e12d862fd36c508521e1/1695736111376/2023+Abbe+Allies+Guide.pdf>
- American Alliance of Museums. *Ethics, Standards, and Professional Practices: Collections Stewardship Standards*. <https://www.aam-us.org/programs/ethics-standards-and-professional-practices/collections-stewardship-standards/>
- American Association of State and Local History (AASLH). *STEPS workbook*. <https://aaslh.org/professional-development/steps/>
- American Institute for Conservation and the Foundation for Advancement in Conservation. “C2C Care Course: Building Collaborations Between Museums and Indigenous Communities.” <https://learning.culturalheritage.org/products/c2c-care-course-building-collaborations-between-museums-and-indigenous-communities>
- American Institute for Conservation. *Resources for Collection Care*. <https://www.culturalheritage.org/resources/collection-care>
- Arizona State Museum. “Respectful Terminology Recommended for Discussion of Human Remains and Funerary Objects in Archaeological Compliance.” Arizona State Museum, 2020. <https://statemuseum.arizona.edu/crm/document/respectful-terminology>
- Association of Registrars and Collections Specialists. *Resource Kit*. <https://www.arcsinfo.org/community/resources/resource-kit>
- Canada Border Services Agency. *Indigenous Cultural Items: Rematriation/Repatriation Services*. Indigenous Affairs Secretariat Contact. <https://museum.bc.ca/wp-content/uploads/2025/06/PUB-Rematriation-Repatriation-Brochure-Print-2023-10-06-B-v3.pdf>
- Canadian Conservation Institute. *Caring for Sacred and Culturally Sensitive Objects*. Government of Canada, Canadian Conservation Institute, 2018. <https://www.canada.ca/en/conservation-institute/services/preventive-conservation/guidelines-collections/caring-sacred-culturally-sensitive-objects.html>

- Canadian Museums Association. **“More than Giving Back: Repatriation Toolkit. A Toolkit in Support of Moved to Action: Activating UNDRIP in Canadian Museums.”** Canadian Museums Association, 2022. https://museums.ca/uploaded/web/TRC_2022/More-than-giving-back.pdf
- Ciri Foundation. **Alaska Museum Sovereignty Guidebook.** <https://thecirifoundation.org/project-grants/alaska-native-cultural-heritage-and-artistic-sovereignty-in-museums/>
- Collison, Jisgang Nika, Sdaahl K’awaas Lucy Bell, and Lou-ann Neel. **Indigenous Repatriation Handbook.** Royal BC Museum and Haida Gwaii Museum at Kay Llnagaay, 2019. <https://www.royalbcmuseum.bc.ca/indigenous/repatriation-handbook>
- Conservation Center for Art and Historic Artifacts. **Additional Resources.** <https://cmptoolkit.org/using-the-toolkit/additional-resources/>
- Conservation Center for Art and Historic Artifacts. **Resources.** <https://ccha.org/resources>
- Deacy-Quinn, Christa. **“FUNDamentals of Museum IPM.”** Spurlock Museum of World Cultures, University of Illinois Urbana-Champaign, 2020. <https://forms.illinois.edu/sec/6828287>
- Edginton, Jenn. **“The Indigenous Ally: Museum Practitioner Toolkit.”** International Coalition of Sites of Conscience. <https://www.sitesofconscience.org/wp-content/uploads/2024/08/Museum-Educator-Toolkit-2024-05-01.pdf>
- Field Museum. **Indigenous Stewardship Guidance.** 2022.
- Foundation for Advancement in Conservation. **Approaching Collections That Evoke Trauma.** https://connectingtocollections.org/collections_trauma/
- Foundation for Advancement in Conservation. **Connecting to Collections Care.** <https://connectingtocollections.org/>
- Foundation for Advancement in Conservation. **Conversation OnLine (CoOL).** <https://cool.culturalheritage.org/>
- Global Indigenous Data Alliance (GIDA). **“CARE Principles for Indigenous Data Governance.”** <https://www.gida-global.org/careprinciples>
- Heritage Preservation with Institute of Museum and Library Services. **Capitalize on Collections Care.** https://www.ims.gov/sites/default/files/publications/documents/caoncc_0.pdf
- Indigenous Navigator. **“The Indigenous Navigator Training Module 9: The Indigenous Navigator Index.”** <https://indigenousnavigator.org/files/media/document/IndigenousNavigatorTrainingModule9-IndexValues-FINAL.pdf>
- Library of Congress. **Collections Care.** <https://www.loc.gov/preservation/care/>
- Local Contexts. **Collections Care (CC) Notices: Usage and Style Guides.** <https://localcontexts.org/wp-content/uploads/2023/08/Collections-Care-Notices-Usage-and-Style-Guide.pdf>
- Local Contexts. **Traditional Knowledge / Biocultural Labels: Usage and Style Guide.** <https://localcontexts.org/wp-content/uploads/2023/08/TK-and-BC-Labels-Usage-and-Style-Guide.pdf>
- MuseumPests.net.** <https://museumpests.net/>
- Museums Association (UK). **Recommendations: Empowering Collections.** <https://www.museumsassociation.org/campaigns/collections/empowering-collections/recommendations-empowering-collections/>
- Museums Australia. **Continuous Cultures, Ongoing Responsibilities: Principles and Guidelines for Australian Museums Working with Aboriginal and Torres Strait Islander Cultural Heritage.** Museums Australia, 2005.
- National Museum of the American Indian. **“About Native Knowledge 360°.”** Smithsonian Institution, n.d. <https://americanindian.si.edu/nk360/about>
- National Park Service. **National Park Service Museum Handbook** [note that the *NPS Museum Handbook* has three parts: “Museum Collections,” “Museums Records,” and “Museum Collections Use”]. <https://www.nps.gov/subjects/museums/museumhandbook.htm>
- Northeast Document Conservation Center. **Free Resources.** <https://www.nedcc.org/free-resources/overview>

- Ogden, Sherelyn, ed. *Caring for American Indian Objects: A Practical and Cultural Guide*. Minnesota Historical Society Press, 2004.
- Pegno, Marianna, Christine Brindza, Patricia Lannes, Kristopher Driggers, and Cecilia Garibay. *Community-Based Curation: A Toolkit for Expanding Narratives and Changing Practice*. Tucson Museum of Art, 2024. https://www.tucsonmuseumofart.org/wp-content/uploads/2024/04/TMA_CommunityBasedCuration_Toolkit_FINAL_web.pdf
- School for Advanced Research. *Guidelines for Collaboration*. <https://guidelinesforcollaboration.info/>
- Smithsonian American Art Museum. *How to Care for Your Collections: Researching Your Art*. <https://americanart.si.edu/research/my-art/care>
- Society of American Archivists. *Archival Repatriation Committee* and Protocols. <https://www2.archivists.org/groups/archival-repatriation-committee>
- Society of American Archives Foundation. *Where Repatriation Meets the Protocols Workbook*. Society of American Archives Foundation, 2021. <https://rmpworkbook.wordpress.com/blog/>
- United Nations. G.A. Res. 61/295, *Declaration on the Rights of Indigenous Peoples*, A/61/PV.108. 13 September 2007. <https://documents.un.org/doc/undoc/gen/n07/504/65/pdf/n0750465.pdf>
- United Nations. *Restitution of Works of Art to Countries Victims of Appropriation*, A/RES/3187(XXVIII). In *Resolutions Adopted by the General Assembly During Its 28th Session, Volume 1: Resolutions and Decisions, 18 September to 18 December 1973*, A/9039, p. 9. United Nations, 1974. https://digitallibrary.un.org/record/190996/files/A_RES_3187%28XXVIII%29-EN.pdf
- United States Department of the Interior. *Museum Resources*. <https://www.doi.gov/museum/professional-resources>
- Western Museums Association. *Self-Care Resources*. <https://westmuse.org/self-care-resources>
- Younging, Gregory. *Elements of Indigenous Style: A Guide for Writing By and About Indigenous Peoples*. 2nd ed. Birchbark Books, 2025.

Appendix

2025 ICC Field-Wide Survey Results

In March 2025, the Indigenous Collections Care (ICC) Working Group worked with Trainer Evaluations to survey the wider museum field. The survey was shared digitally over multiple listservs and professional networks to reach a maximum and broad audience. The survey captured the existing perceptions and actions within museums and collecting institutions related to culturally appropriate collections stewardship.

The feedback from the survey informed the development of additional resources to advocate for and integrate culturally appropriate care within an institution. It also provided guidance on how to market and present the *ICC Guide* within the climate of the Duty of Care provision in the 2024 revised Native American Graves Protection and Repatriation Act (NAGPRA) regulations.

In total, 307 individuals responded to the survey. Below is an excerpt of data from that survey. The full data set is retained by the ICC Working Group.

Table 1

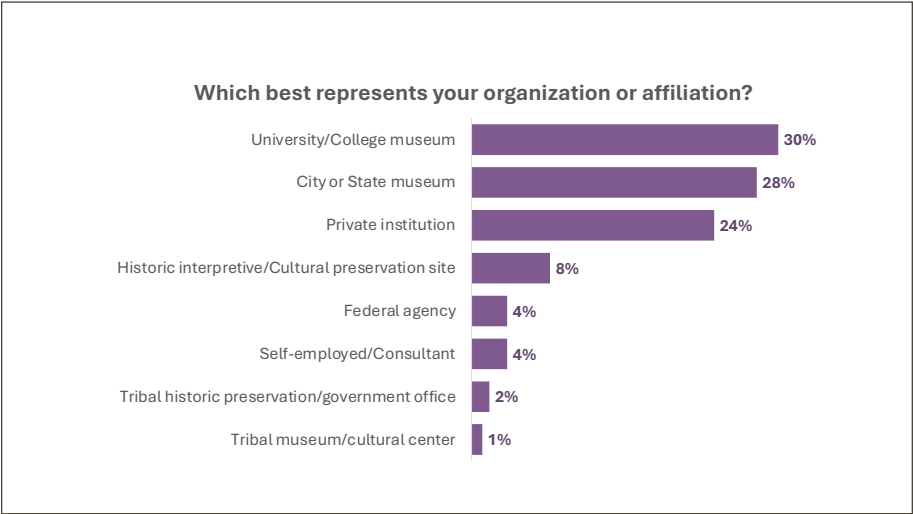


Table 2

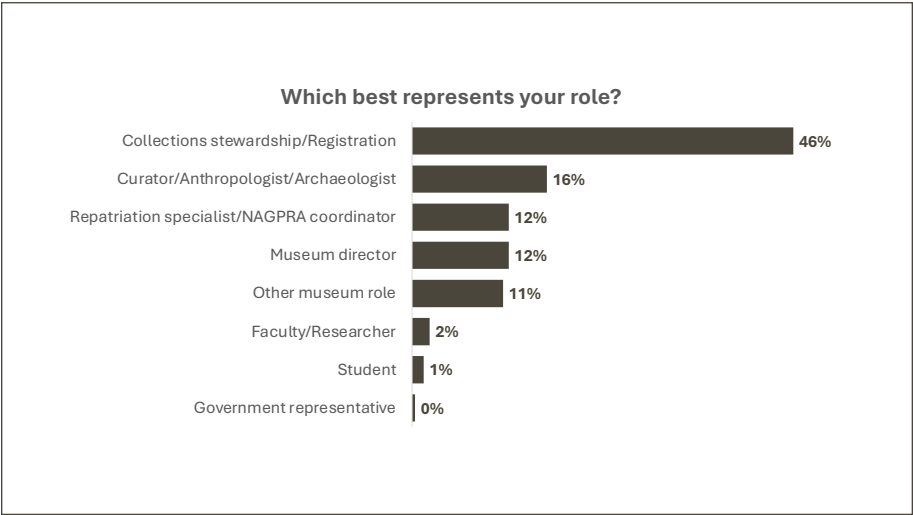


Table 3

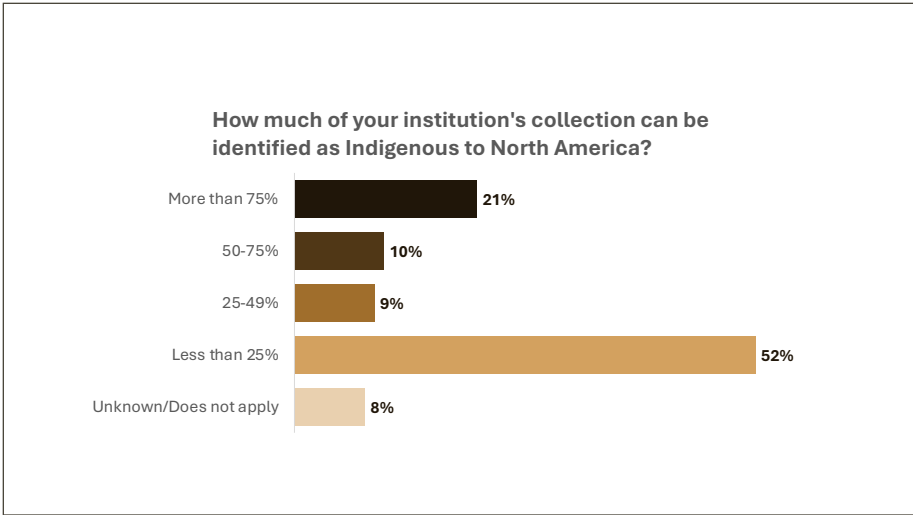


Table 4

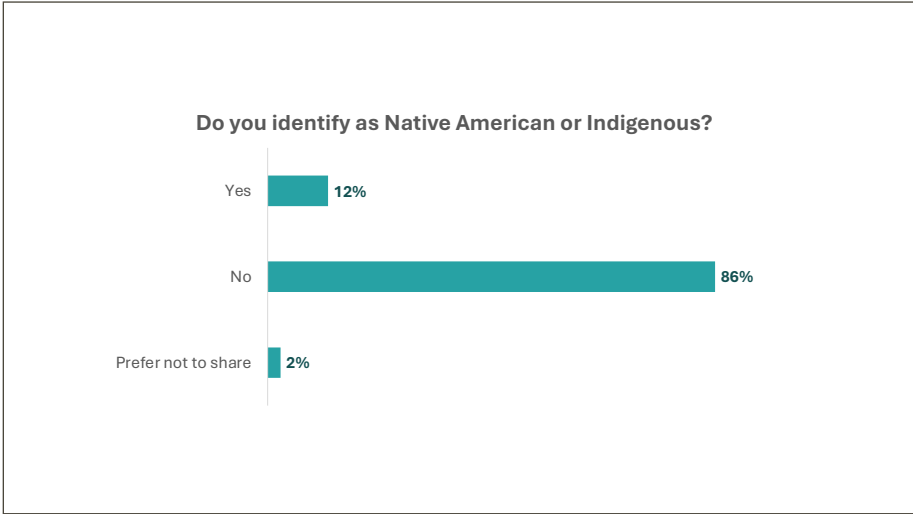


Table 5

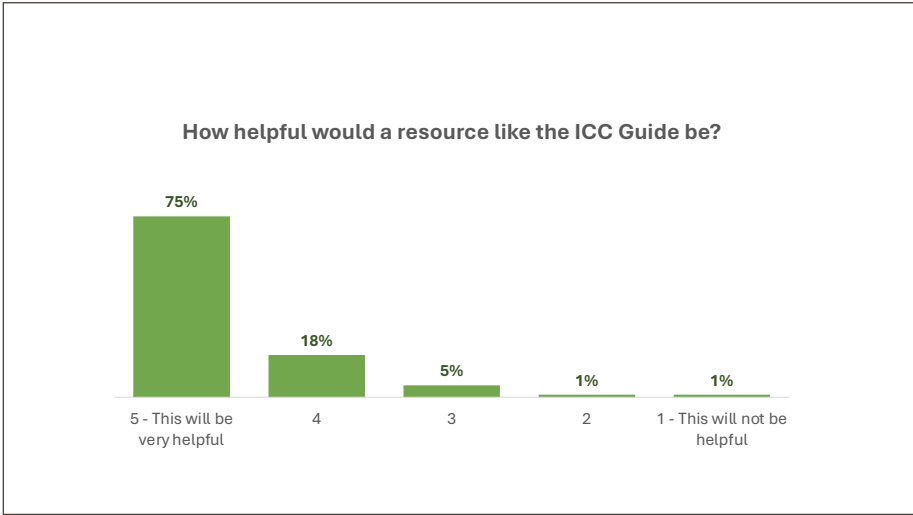


Table 6

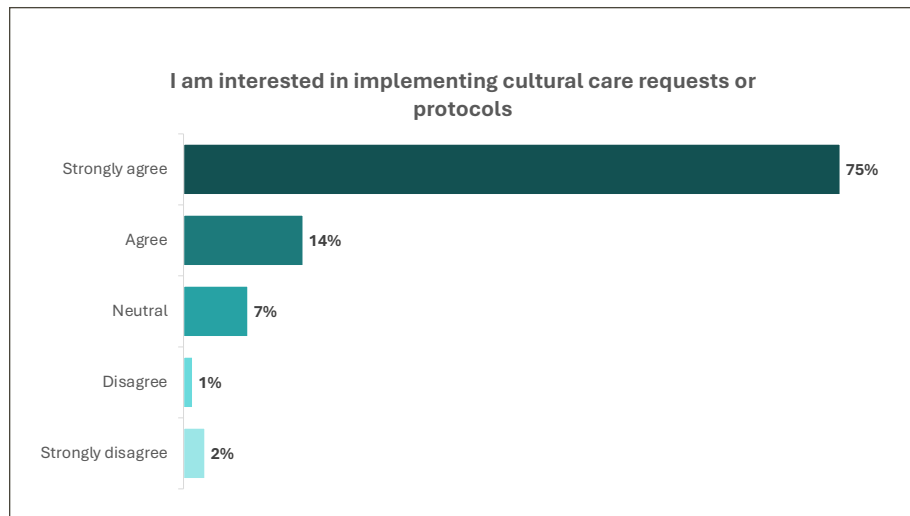


Table 7

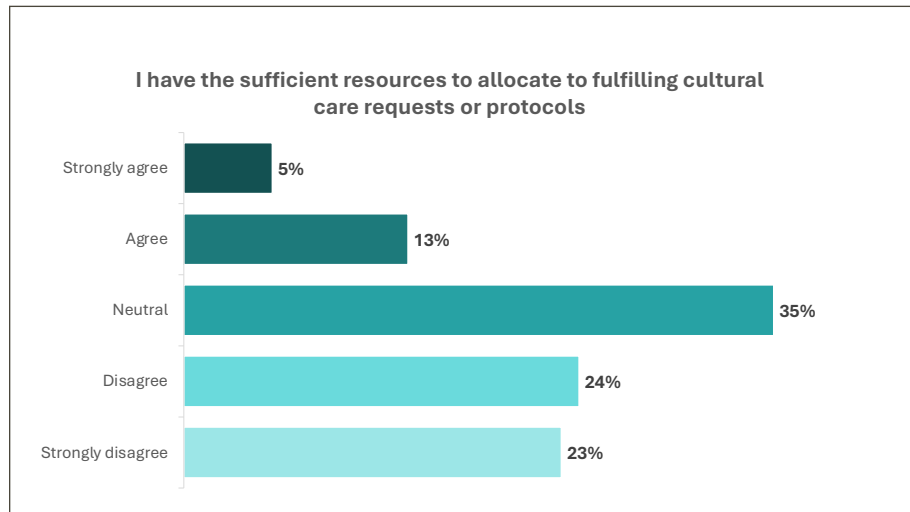
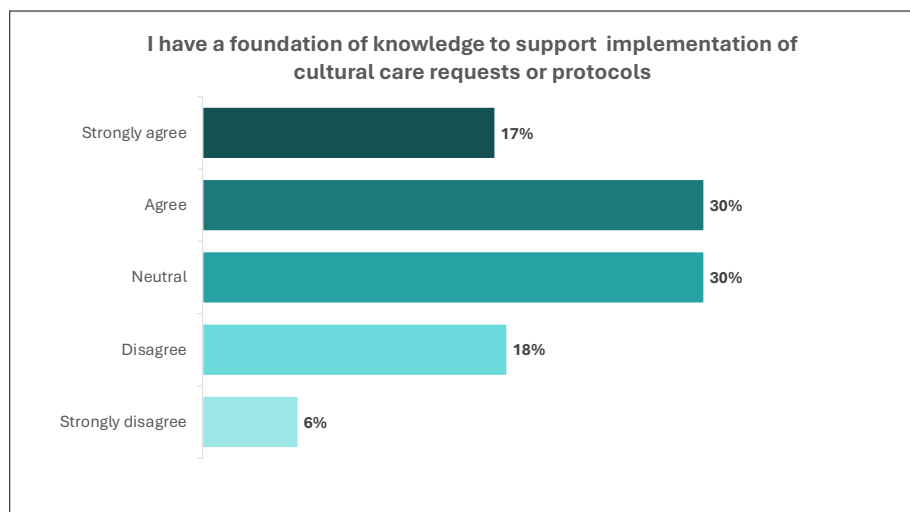


Table 8



US Laws Affecting Museum Collections

Excerpted from John E. Simmons, *Things Great and Small: Collections Management Policies*, 3rd ed. (Rowman and Littlefield, 2024), xxiii, 287.

LAW, REGULATION, OR TREATY	INFORMATION SOURCE	PURPOSE
Antiquities Act of 1906	16 U.S.C. §§ 431-33 https://www.nps.gov/subjects/archeology/antiquities-act.htm	Protects historic and prehistoric ruins and monuments on public lands from being destroyed or damaged. Requires permits to gather or excavate archaeological objects or objects of antiquity from federal lands.
Archaeological Resources Protection Act of 1979	16 U.S.C. §§ 470aa-470mm https://www.nps.gov/subjects/archeology/archaeological-resources-protection-act.htm	Expands the Antiquities Act of 1906, and further protects archaeological resources and sites on public land and Indian land by prohibiting the sale, purchase, transport, exchange, or receipt of archaeological resources removed without permission after 1979. Establishes permits for excavation or gathering of archaeological resources and regulates their curation.
Arts and Artifacts Indemnity Act, as Amended	Public Law 94-158 http://uscode.house.gov/statutes/pl/94/158.pdf	Provides immunity from seizure for museum objects under certain circumstances.
Bald and Golden Eagle Protection Act	16 U.S.C. §§ 668 et seq. http://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter5A/subchapter2&edition=prelim https://www.fws.gov/law/bald-and-golden-eagle-protection-act	Makes it illegal to take, sell, purchase, or barter in eagles or eagle parts.
Convention on Cultural Property Implementation Act (CCPIA)	19 U.S.C. §§ 2601-13 https://www.law.cornell.edu/uscode/text/19/chapter-14	Makes certain cultural objects subject to seizure if they are imported into the United States in violation of the laws of their country of origin.

LAW, REGULATION, OR TREATY	INFORMATION SOURCE	PURPOSE
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	https://cites.org https://www.fws.gov/international/cites	Controls international traffic of animal and plant species threatened by commercial trade.
Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property (UNESCO Convention), 1970	https://www.unesco.org/en/legal-affairs/convention-means-prohibiting-and-preventing-illicit-import-export-and-transfer-ownership-cultural	Parties to the convention agree to oppose illicit import, export, and transfer of ownership of cultural property.
Curation of Federally Owned and Administered Archaeological Collections	36 CFR 79 https://www.nps.gov/subjects/archeology/36cfr79.htm https://www.gpo.gov/fdsys/granule/CFR-2012-title36-vol1/CFR-2012-title36-vol1-part79	Establishes minimal standards for the management and care of federally owned archaeological collections.
Endangered Species Act of 1973	16 U.S.C. §§ 1531-44 http://www.biologicaldiversity.org/campaigns/esa/esatext.html	Protects threatened and endangered species of animals and plants by making it illegal to import, export, possess, sell, or transport specimens of listed species without permission.
Freedom of Information Act of 1966	5 U.S.C. § 552, as Amended by Public Law No. 104-231, 110 Stat. 2422 https://www.foia.gov/	Establishes standards for determining which federal government records must be disclosed and which records can be withheld.
Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict, 1954	https://www.unesco.org/en/legal-affairs/convention-protection-cultural-property-event-armed-conflict-regulations-execution-convention	Protects cultural property during wartime.

LAW, REGULATION, OR TREATY	INFORMATION SOURCE	PURPOSE
Historic Sites Act of 1935	16 U.S.C. §§ 461-471 https://www.nps.gov/subjects/archeology/historic-sites-act.htm	Strengthens the Antiquities Act of 1906 by preserving historic sites, buildings, and objects of national significance for public use.
Immunity from Seizure Under Judicial Process of Cultural Objects Imported for Temporary Exhibition or Display statute	22 U.S.C. § 2459 https://www.state.gov/immunity-from-judicial-seizure-statute-22-u-s-c-2459	Provides limited protection from seizure of objects under certain circumstances.
Importation of Pre-Columbian Monumental or Architectural Sculpture or Murals Act (Pre-Columbian Art)	19 U.S.C. §§ 2091-95 https://www.unesco.org/en/cultnatlaws/regulation-importation-pre-columbian-monumental-or-architectural-sculpture-or-murals-public-law-92	Prohibits the importation into the United States of any pre-Columbian material without a certificate of exportation from the country of origin.
Lacey Act of 1900	18 U.S.C. § 42 16 U.S.C. § 3371 https://www.fws.gov/law/lacey-act	Prohibits the importation, exportation, transportation, sale, receipt, acquisition, or purchase of any animal or plant that was obtained or transported in violation of any other law or regulation.
Marine Mammal Protection Act	16 U.S.C. §§ 1361-1407 http://www.nmfs.noaa.gov/pr/laws/mmpa/	Bans the importation of marine mammals or marine mammal parts.
Migratory Bird Treaty Act	16 U.S.C. §§ 703-12 https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php	Prohibits the killing, capture, collecting, possessing, buying, selling, transport, import, and export of migratory birds, their nests, and eggs.
National Environmental Policy Act (NEPA)	42 U.S.C. §§ 4321-70a https://www.epa.gov/NEPA	Requires consideration of environmental and cultural values along with economic and technological values in assessing proposed federal projects.

LAW, REGULATION, OR TREATY	INFORMATION SOURCE	PURPOSE
National Historic Preservation Act of 1966	16 U.S.C. §§ 470 et seq. https://www.nps.gov/subjects/archeology/national-historic-preservation-act.htm	Provides a broad base of federal protection for significant domestic cultural resources.
National Stolen Property Act (NSPA)	18 U.S.C. §§ 2314-15 https://www.justice.gov/archives/jm/criminal-resource-manual-1312-national-stolen-property-act-goods-ware-merchandise	Can be applied to encroachments on legitimate and clear ownership rights to imported objects.
National Trust for Historic Preservation	16 U.S.C. § 468 https://savingplaces.org/	Creates a private, nonprofit corporation that receives donated sites, buildings, and objects that are significant in United States history and culture and preserves and administers them for the public benefit.
Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)	25 U.S.C. §§ 3001-3013 https://www.nps.gov/subjects/nagpra/the-law.htm https://www.nps.gov/nagpra/	Allows Native Americans and Native Hawaiians to claim custody of human remains, funerary objects, sacred objects, and objects of cultural patrimony that are in the control of federal agencies and museums that receive federal funding.
Occupational Safety and Health Act (OSHA)	29 U.S.C. ch. 15 § 651 et seq. https://www.osha.gov/laws-regs/oshact/completeoshact	Ensures safe and healthy working conditions by establishing and enforcing workplace standards and by providing research, educational information, and training.
Old Loan Legislation	https://www.arcsinfo.org/content/documents/arcsmuseumpropertyandoldloanlegislationjune2018.pdf	Legislation varies from state to state.
State preservation laws	Varies from state to state	Various state-level preservation programs.

LAW, REGULATION, OR TREATY	INFORMATION SOURCE	PURPOSE
Tax Reform Act of 1984		Requires museums to notify donors and the Internal Revenue Service (IRS) if certain donated property is sold, exchanged, or otherwise transferred within three years of the date of gift.
Unidroit Convention on Stolen or Illegally Exported Cultural Objects	http://www.unidroit.org/instruments/cultural-property/1995-convention	Endorses repatriation of cultural property.
Visual Artists Rights Act (VARA) of 1990	17 U.S.C. §§ 106A et seq. https://www.law.cornell.edu/uscode/text/17/106A	Protects an artist's rights of attribution and integrity. The right of attribution gives an artist the right to claim authorship of a work, to disown authorship, or to not be named as the author of a work the artist did not create.
Wild Exotic Bird Conservation Act	16 U.S.C. § 4901 https://www.fws.gov/law/wild-bird-conservation-act	Prohibits the importation of exotic birds in violation of other laws and regulations.

Administrative Handout

Purpose

To provide a handout that collections professionals can share with administrators, introducing them to the concept of culturally appropriate care and illustrating field-wide movements and third-party support.

The *Indigenous Collections Care Guide* (ICC Guide) will be cited as the primary resource to help people through this work. Although it would be impossible to create a handout that covers every need for everyone, the talking points provide basic tools and frameworks for expanding conversations with administrators. This language can be used when talking with administrators directly, or referenced to clarify legal requirements, to adhere to accreditation guidelines, and to implement best practices.

The *ICC Guide*, which this supplements, is a valuable resource that offers detailed guidance on how to effectively implement culturally appropriate stewardship. The *ICC Guide's* approach is grounded in meaningful consultation with communities whose cultural materials can be found in institutional collections. The guide addresses all aspects of collections stewardship such as handling, documentation, loan procedures, risk management, research access, and more. The *ICC Guide* also informs and supports compliance with applicable state, federal, and international laws and regulations concerning repatriation and

stewardship of Indigenous ancestors and cultural items, including the Native American Graves Protection and Repatriation Act (NAGPRA).

Approaching Administration

When presenting these ideas to administrators, avoid creating a divisive “us vs. them” dynamic; instead, foster an inclusive conversation. Administrators and board members may be especially responsive to the potential for negative consequences if they don’t adopt culturally appropriate care: lost funding and donor opportunities, legal penalties, damaged reputation, difficulty attracting and retaining highly qualified staff, and adverse media coverage. However, it’s equally important to highlight the positive results, such as strengthened relationships, new grant and funding opportunities, and robust collection policies.

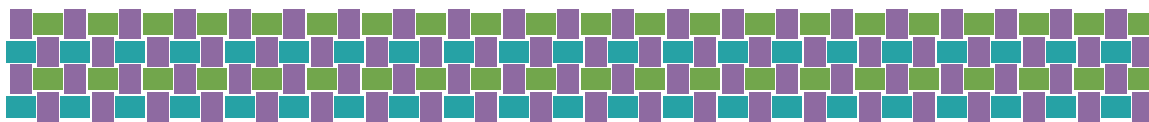
Scope

While the *ICC Guide* is designed to be broad, and inclusive of all Indigenous cultures, this Administrative Handout specifically focuses on Native American Tribes and Nations. This narrower scope helps streamline the conversation and makes it easier to address NAGPRA and other laws and regulations.

**INDIGENOUS
COLLECTIONS
CARE GUIDE**

www.sarweb.org/iarc/icc

MOVING TOWARD CULTURALLY APPROPRIATE CARE OF NATIVE COLLECTIONS



What Is Culturally Appropriate Care of Native American Collections?

To be responsive to, and affirming of, a Tribe or Native Nation's requirements, beliefs, values, ethical norms, language needs, religion, spirituality, and individual differences related to the stewardship of *all* Native cultural materials.¹ It is not limited to items subject to the Native American Graves Protection and Repatriation Act (NAGPRA).

Recentering collections stewardship around Native perspectives recognizes the sovereignty of Native Nations, their unique political and legal status, and their authority over their own material culture.

What Types of Institutions Should Practice Culturally Appropriate Care?

Any institution with Native American cultural material can adopt these practices, regardless of the collection's scope, funding sources, or governance structure. This includes children's museums, historical societies, private museums, art museums, university departments, and government agencies.

In 2025, a nationwide survey of over three hundred museum professionals revealed that 89 percent are

interested in implementing culturally appropriate care. Of those respondents, more than half said that Native American cultural material composed less than 25 percent of the collection.² The museum field is normalizing and standardizing the integration of culturally appropriate care. This approach is no longer the exception: It is now the expectation for best practices and is being enfolded into accreditation standards.

Why Should Institutions Involve Native Nations in The Stewardship of Cultural Material?

Many museums were acquiring collections during times when Native voices were excluded from decision-making. Today, institutions have an opportunity, and a responsibility, to reconnect communities with collections through meaningful consultation and reciprocal relationships. Intentionally embracing culturally appropriate collections care can enrich connections, enhance stories, and deepen educational opportunities.

Failure to engage with Native Nations in culturally appropriate care may result in loss of donors and funding opportunities, legal penalties, a damaged institutional reputation, negative media coverage, and an inability to recruit and retain top staff, as well as inaccurate and incomplete information in public programming and exhibitions.

1 School for Advanced Research. [Standards for Museums with Native American Collections](#) (SMNAC) (May 2023), 21. This wording is derived from the definition in SMNAC.

2 Indigenous Collections Care Working Group. *Indigenous Collections Care Guide* (2026), 122–124.

When Tribal representatives were surveyed after *ICC Guide* content-review sessions (in 2023 and 2024), 78 percent of the respondents found the recommendations provided in the guide to be mostly or completely realistic within their current capacities. In addition, 91 percent of the respondents said that culturally appropriate care is an important part of their practice. One survey respondent said, “Everything covered in the guide is imperative and must be considered if . . . museums are to stay relevant and vibrant.”

What Support Exists for the Proposed Culturally Appropriate Care Approach?

In the same 2025 survey, only 19 percent of those respondents interested in implementing cultural care protocols felt that they had sufficient resources to fulfill those protocols. Institutions have the opportunity to invest in time, staffing, and other resources to lead by example and make an impact in this growing practice.

The *ICC Guide* provides frameworks to recenter collections stewardship practices in ways that respect the needs and knowledge of Native American and other Indigenous community members. It serves as a bridge between Indigenous community perspectives and traditional museum collections management practices, helping those involved in all aspects of collections to engage in thoughtful conversations about culturally appropriate care.

What Capacity and Resources Are Needed?

Fully realizing and implementing culturally appropriate care will not happen immediately; it *can* be implemented incrementally. Some practices, in fact, do not require additional time or resources and can be integrated into the daily tasks of museum staff and volunteers.

Relationships are at the heart of culturally appropriate care. Developing, nurturing, and maintaining relationships is a commitment on all sides and may require additional staff or reallocated resources.

How Can an Institution Demonstrate a Commitment to Culturally Appropriate Care?

Institutional policy and administrative documents provide information on how resources, including staffing and funding, are allocated. You can ensure that these culturally appropriate care practices will continue, regardless of employee turnover, by integrating them into your institution’s policies and procedures, which will make the work sustainable and the institution accountable.

**INDIGENOUS
COLLECTIONS
CARE GUIDE**

www.sarweb.org/iarc/icc

Talking Points for Working with Leadership

This supplement to the Administrative Handout lists a series of prompts for information and data that should help you address your institution's specific situation. You know best what your institutional administration will respond to, so use the talking points below as guidance, modifying them to fit your needs.

What is Culturally Appropriate Care of Native American Collections?

Culturally appropriate care acknowledges and embraces the human connection with and among Native collections in museums. This respectful and empathetic approach centers Native perspectives.

Implementing culturally appropriate care is not DEI (diversity, equity, inclusion) work. DEI focuses on fostering an equitable and inclusive environment for underrepresented and marginalized groups. Native Nations have a unique political and legal status as sovereign entities—recognized in the Constitution, treaties, and federal laws—and this status separates DEI work from culturally appropriate care and consultation.¹

What Types of Institutions Should Practice Culturally Appropriate Care?

Any institution that stewards Native cultural material should make an effort to engage in culturally appropriate care practices. Even if the amount of Native material in the collection is very small, it still deserves to be treated appropriately and with respect. This can be accomplished with a phased approach and integration into daily collections stewardship activities.

If your institution is concerned with accreditation, the American Alliance of Museums (AAM) has added the Standards for Museums with Native American Collections (SMNAC) to its Framework for Museum Excellence. The standards outlined in SMNAC will inform AAM's Museum Assessment Program and Accreditation reviews for museums with Native American collections.²

1 United States Senate Committee on Indian Affairs, "[Murkowski Speaks on Senate Floor to Highlight Letter to OMB to Ensure Tribes Are Not Impacted by Executive Orders](#)," press release, February 15, 2025; Sarah Liese (Twilla), "[Tribal Leaders Commend Secretary of Interior for Their Exemption from Order Slashing DEI Programs](#)," KOSU (Oklahoma), February 6, 2025; and Coalition for Tribal Sovereignty, "[RE: Status of Tribal Nations as Political Entities in the Implementation of the President's New Executive Orders](#)," February 2, 2025.

2 American Alliance of Museums, "[New Standards for Museums with Native American Collections \(SMNAC\) Now Available](#)," press release, July 25, 2023.

Think about why this might be important for your institution, and prepare information that will be relevant to your situation. Include:

- your institution's collecting history, historical background, scope, mission, and audience
- information on the portion of the collection that will benefit from culturally appropriate care
- the status of NAGPRA compliance at your institution
- your institution's existing, historical, or potential relationships with Native Nations

Why Should Institutions Involve Native Nations in the Stewardship of Cultural Material?

Historical collecting practices are built on the foundation of colonization, which separated items from their cultural context through extractive actions. Institutions and others mimicked successful collecting strategies, such as those used for natural history specimens, and amassed large assemblages of Native cultural material. Exhibitions and research of these Native collections were conducted about communities rather than in consultation with them, establishing the institutions as the experts rather than the Native Nations themselves. These colonial-based actions have disconnected cultural materials from their communities, thus perpetuating intergenerational trauma and loss of traditional knowledge. These systemic barriers manifest throughout a museum's functions, including how cultural materials are stewarded. Mainstream collections management "best practices" and nomenclature are limited and inadequate when it comes to caring for the physical, intellectual, and spiritual needs of Indigenous cultural materials.³ Fostering relationships around culturally appropriate care creates many opportunities for institutional growth and expanded mission relevance. Meaningful relationships and ethical stewardship can result in:

- a deeper understanding of collections from Native Nations
- exhibitions with stronger community buy-in and deeper narratives
- impactful, ethical, and collaborative research
- augmentation of information and identification of collections
- a shift in internal morale and culture
- collaborative public programming
- expanded constituents and audience
- increased fund-raising opportunities

Repatriation is the priority of nearly all Indigenous communities. Repatriation under NAGPRA must be a component of your initial conversations with Native Nations to ensure basic legal compliance and establish a baseline relationship.

Native Nations also consider culturally appropriate care a priority. Representatives often want to be involved in collections care or collaboration with institutions

³ Laura Bryant, Marla Taylor, and Laura Elliff Cruz, "[Reconsidering Institutional Research Policies on Indigenous Collections](#)," *Advances in Archaeological Practice* (July 2025): 1–9.

but don't always have the capacity. Tribes and Native Nations are inundated with requests from museums and institutions for consultation and collaboration. While this can be overwhelming for communities, and frustrating for institutions, it cannot be a barrier to outreach. If a project requires consultation or collaboration and a Native Nation is not available to engage with you, your institution must be willing to shift plans and priorities.

Culturally appropriate care, and other curation requirements, may be included in state and local legislative actions in addition to federal laws. For items subject to NAGPRA, Duty of Care applies and is a legal requirement. Some legislative action may include criminal or financial liabilities for failure to comply. For example, NAGPRA has a criminal investigator who looks into claims of noncompliance.

- Research and list state, local, and municipal laws applicable to your institution.
- Note that culturally appropriate care can be different from NAGPRA compliance and Duty of Care.

Beyond the legal ramifications, what will happen if you don't adopt culturally appropriate care? There is no way to know concretely what the consequences will be. However, failure to implement this practice on some level will strain relationships with Native Nations before they even begin. Mending a damaged reputation can span an entire generation of a Tribe's and museum's workforce. Collections are the invisible infrastructure of an institution, and choices made about stewardship affect other aspects of the institution such as exhibitions and programming. Other effects might include:

- potential loss of funding opportunities
- loss of relationships with Native Nations and other key stakeholders and constituents
- a damaged reputation in the field and among the public
- negative media coverage initiated by disenfranchised communities
- lower quality candidates for positions across the institution
- compromised accreditation renewals

What Support Exists for the Proposed Culturally Appropriate Care Approach?

See [Existing Resources and Support](http://www.sarweb.org/iarc/icc) in the *ICC Guide* (in print and online at www.sarweb.org/iarc/icc).

What Capacity and Resources are Needed?

Use the following prompts strategically to strengthen your proposal.

Where are you now?

- What culturally appropriate care components have you already started?

- What is the current status of your relationship with Native Nations?
- How much support (resources, staff, training, space) do you currently have for collections stewardship and consultation?

Where do you want to be? What do you need to get there?

- What is the next step or project that you can take on with the resources you currently have?
- Do you have Nations approaching your institution for access, consultation, or other needs? What are their priorities?
- What are some realistic, achievable goals and projects you can work toward in the near term if you had additional resources? How long will it take, who will be involved, and how much will it cost? Where can this lead and how can it grow?
- Develop broad estimates of what resources (staff, funding, space, supplies, etc.) are needed for upcoming incremental steps. This includes internal and external needs and funding sources.

Which relationships can be developed, repaired, or nurtured with Native Nations?

- Develop a working institutional partner list.
- What do your partners want from you?
- How are these relationships reciprocal?

How Can an Institution Demonstrate a Commitment to Culturally Appropriate Care?

The best way to implement and sustain the framework outlined in the *ICC Guide* is to integrate these approaches into institutional policy and administrative documents. Policies help inform where you allocate your resources, including staffing and funding; they ensure that practices continue beyond individual employees; and they hold the institution accountable. The positive impact of rewriting those policies to center culturally appropriate collections stewardship practices cannot be overstated. Buy-in, participation, and consistency from the highest levels of institutional administration will cultivate ongoing support for this approach.

- What are the specific policies at your institution that could be affected?
- What is the process of making changes to those documents?

To avoid over-promising and under-delivering, institutions must pause and reflect on where they are now, where they want to be, and what resources exist or are needed for this work. This mindful approach will lead to more authentic, transparent, and realistic relationships.

Sample Collections Access / Research Request Form

Today's Date: _____ **Requested Access Period:** From _____ to _____

☐ On-site visit ☐ Digital request (no on-site visit) ☐ Workshops/tours

Researcher Contact Information

Name(s): _____

Affiliated institution(s) and title(s): _____

Email(s): _____

Address(es): _____

Phone number(s): _____

☐ Student* ☐ Curator ☐ Professor ☐ Independent researcher ☐ Other

*(*Students are required to provide a letter of support from a faculty member who is familiar with their research.)*

Research Description

Summary of the project/research objectives:

Description of collections to be examined (include item names, type, and catalog numbers if available):

Description of the methods of examination* and types of documentation to be used (e.g., photography, measurements, etc.):

*(*Note that any research methodology beyond standard, noninvasive techniques must be approved via a separate Analysis Request Form.)*

Sources of funding (if applicable):

For Indigenous Collections

Have you initiated contact with the designated representative of the affiliated (or potentially affiliated) descendant communities of the collection you wish to access?

Do you need assistance identifying the affiliated (or potentially affiliated) descendant communities to contact?

Summarize the consultation conversations related to the proposed research. This can be provided as a separate statement (not to exceed one page).

How will this project benefit the descendant communities?

Dissemination

Describe the intended final product(s) of this project:

Is a publication or presentation intended? If yes, explain:

How will the results of the research be used?

Terms and Conditions

1. Only the purpose, collections, and methodology described above are included in this request. Any additions or derivatives require another request and approval. This includes the use of data collected as a result of this request in future projects.
2. I will share all letters or correspondence from descendant communities supporting or *not* supporting my request.
3. I will follow all handling training and guidelines provided by staff and observe any relevant cultural protocols provided by the descendant community. I will conduct myself and my activities in a respectful and professional manner.
4. Permission to photograph is for research purposes only. This permission does not infer or imply any rights to publish, and the photographer assumes all copyright liabilities. Permission may not be transferred. Images may not be shared, transferred, or distributed in any form, digital or otherwise, without securing additional permissions. This includes posting on social media, unless express permission is obtained.
5. I will share my results, data, and final product (such as a publication or citation) with the institution and with any affiliated descendant communities in a timely fashion.
6. Failure to comply with the terms and conditions above may result in an indefinite ban of access to any collections or secure spaces at the institution. Descendant communities will be made aware of failures to comply.

The applicant agrees to the above terms and conditions and acknowledges the information above is correct to the best of their knowledge.

Applicant Signature:_____ Date:_____

The Applicant(s) is granted permission for access to and provision to the above-described collection(s) of the Institution, with any changes or exceptions listed below, according to the terms and conditions stipulated on the above form.

Changes or Exceptions (if applicable):

Institutional Approval:_____ Date:_____

Notes

Notes

Copyright © 2026 Laura Bryant, Laura Elliff Cruz, and Marla Taylor.

Citation: Indigenous Collections Care Working Group. 2026. Indigenous Collections Care Guide <https://sarweb.org/iarc/icc/>. Edited by Laura Bryant and Marla Taylor.

This project was made possible in part by the Institute of Museum and Library Services.

ISBN: 979-8-234-16949-5

Copyeditor: Jennifer Boynton

Designer and Illustrator: Neebinnaukzhik Southall (Chippewas of Rama First Nation)

Typefaces:

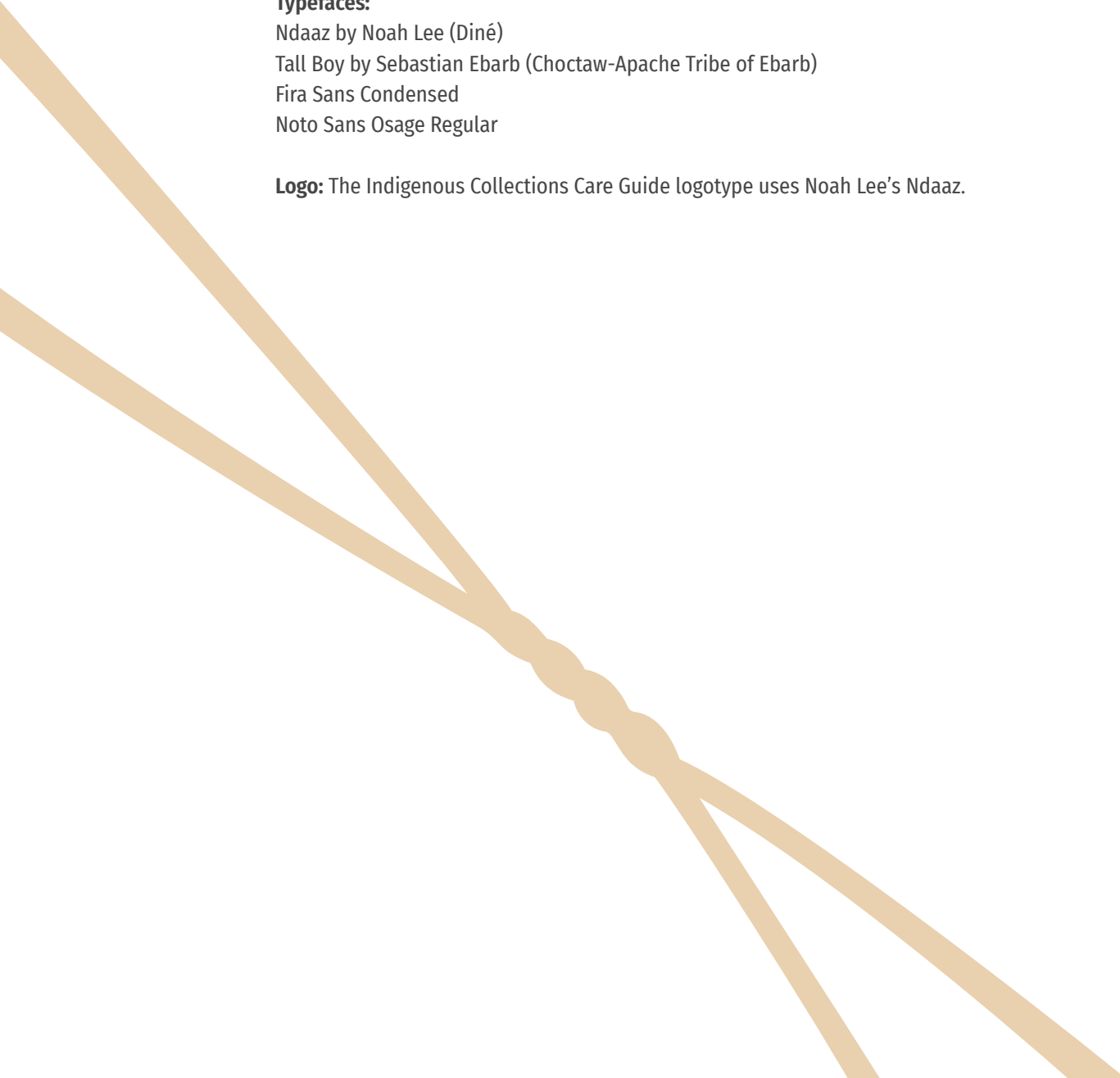
Ndaaz by Noah Lee (Diné)

Tall Boy by Sebastian Ebarb (Choctaw-Apache Tribe of Ebarb)

Fira Sans Condensed

Noto Sans Osage Regular

Logo: The Indigenous Collections Care Guide logotype uses Noah Lee's Ndaaz.

A decorative graphic in the bottom left corner consisting of two thick, light-brown lines that intersect and form a knot-like shape, extending diagonally across the page.

