

NATIVE AMERICAN GRAVES PROTECTION & REPATRIATION ACT (NAGPRA) POLICY

I. Introduction

The Alutiiq Museum's Collections Management Policy mandates that all collections' activities comply with municipal, state, and federal laws, and any applicable international treaties that govern antiquities management, wildlife protection, and the treatment of human remains. This includes the Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations. The Alutiiq Heritage Foundation Board of Directors (AHF) fully supports the museum's implementation of NAGPRA and establishes the following policy to guide that process.

II. Background

Founded in 1995, the Alutiiq Museum developed from the Kodiak Area Native Association's (KANA) Cultural and Heritage Division. The museum inherited the bulk of its collections from KANA, including human remains and funerary objects. Following the museum's inception, staff members developed a professional collections program and worked to gain full legal control of the museum's holdings. This work included completion of the documentation, consultation, reporting, and publication necessary to comply with NAGPRA. To date the museum has:

- Published Notices of Inventory Completion (NIC) for the human remains and funerary objects in its control.
- Worked with controlling federal agencies to develop NIC for human remains in the agencies' control but stored at the Alutiiq Museum.
- Assisted Alutiiq organizations with standing to claim (AOSTC) under NAGPRA with the location and repatriation of human remains stored in its repository and in other repositories.
- Developed and maintained the Alutiiq Ancestors' Memorial, a city park that educates the public about the Alutiiq people and the repatriation of ancestral remains.
- Advocated for improvements to the federal administration of NAGPRA.
- Worked to complete repatriation projects that fall outside of NAGPRA, including repatriation of the remains of Kodiak Alutiiq children who died at boarding schools far from home.

The Alutiiq Museum continues to:

- Work with AOSTC to complete the repatriation ancestral remains that come into its care.
- Provide up to one year of storage for repatriated or returned ancestral remains while AOSTC arrange for reburial.
- Provide long-term storage for funerary objects that AOSTC have chosen to place on loan.
- Act as the regional repatriation coordinator, compiling and maintaining information on ancestral remains and objects held in other repositories and assisting AOSTC with repatriation activities in collaboration with the Kodiak Alutiiq/Sugpiaq Repatriation Commission.

III. Authority and Responsibilities

As the policy setting body for the Alutiiq Museum, the AHF board represents the final authority in all operations of the museum. This fiduciary responsibility includes making decisions regarding the care and management of museum collections and ensuring public confidence in the museum's implementation of NAGPRA.

The AHF entrusts decisions regarding the care and management of Alutiiq Museum collections to the museum's executive director and curator of collections. These staff members will guide work by the museum's curatorial staff to stabilize, document, research, store, and share the museum's collections in a manner that meets all the requirements of NAGPRA, following the provision of the museum's

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Collections Policy, Code of Ethics, Exhibits Policy, and Guidelines for the Spiritual Care of Objects, as well as professional standards of collections management, curation, and conservation.

Further, the AHF recognizes that all Alutiiq people and organizations have a strong interest in repatriation, regardless of their currently perceived standing to claim under that law. Returning our ancestors to their homeland and final rest is community work that has been encourage, arranged, and funded by many. This includes our Alaska Native Claims Settlement Act (ANCSA corporations) who have provided essential leadership for repatriation. The Alutiiq Museum shall work with all interested parties in managing repatriations.

The Alutiiq Museum archaeologists shall:

- Complete all necessary permits, notifications, consultations, or any other requirements as defined by NAGPRA regulations when preparing for an archaeological investigation on state, federal, or tribal land;

The Alutiiq Museum Curator of Collections shall:

- Identify materials that may fall under NAGPRA in the museum's collections;
- Determine cultural affiliation as outlined by NAGPRA;
- Prepare summaries and inventories as required by NAGPRA;
- Oversee the process of repatriation.
- Assist Alutiiq organizations with standing to claim (AOSTC) with accessing Alutiiq Museum collections information and processing repatriation requests for items controlled by the Alutiiq Museum.
- Maintain files for all NAGPRA-related work, including related collections files, inventories, summaries, and correspondence;
- Communicate with other museums or federal agencies that may have control of human remains, funerary objects, sacred objects, or objects of cultural patrimony that are possessed by the Alutiiq Museum;
- Notify AOSTC regarding the completion of summaries and inventories;
- Communicate with claimants regarding repatriation claims and the disposition of repatriated materials, including informing recipients of repatriations of any presently known treatment of the materials with pesticides, preservatives, or other substances that represent a potential hazard to the objects or to persons handling the materials;
- Communicate with National NAGPRA Program regarding the completion of inventories, repatriation requests, completed repatriations, or any other required communication;
- Establish and maintain procedures for identifying ancestral remains and objects available for repatriation, recording that information, and sharing it with AOSTC; and
- Establish and maintain procedures to permanently document the contents and recipients of all repatriations;
- Take steps to ensure that sensitive information is not made available to the public as requested by AOSTC.

IV. Incoming acquisitions, Documentation, Storage, Care, and Use

General methods for managing the acquisition, documentation, storage, care, and use of museum collections for research, exhibits, and loans, are outlined in the Alutiiq Museum's Collections

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Management Policy which includes specific provisions for the treatment of human remains, funerary objects, sacred objects, and objects of cultural patrimony.

V. Culturally Sensitive Care

The museum's staff shall maintain a set of Guidelines for the Spiritual Care of Objects that unite professional museum practice with Alutiiq cultural values to ensure the respectful and culturally sensitive care of all materials entrusted to the museum. These guidelines shall specifically outline the steps needed to ensure the appropriate care and protection of Alutiiq objects and information identified as culturally sacred.

The museum shall designate an area of its collections room for the separate care of human remains, funerary objects, and sacred objects. This area will be placed in a quiet part of the facility and covered to prevent inadvertent viewing or disturbance of the materials it contains. Access to this area shall be limited and provided at the discretion of the curator of collections.

VI. Repatriation

It is the Alutiiq Museum's intent to act upon repatriation requests as quickly as possible, within the guidelines of NAGPRA.

Human remains, funerary objects, sacred objects, and objects of cultural patrimony do not fall under the museum's deaccession policy. When the museum receives a repatriation request by a federally recognized organization with standing to claim, the materials will be released as defined and specified by NAGPRA. No review by the Collections Advisory Committee or the AHF Board will be required, although both groups will be notified of such a release.

When materials have been repatriated, the museum will maintain documentation regarding the materials and the repatriation in perpetuity. Access to these records may be restricted to key museum staff members—Executive Director and curatorial staff—and by request of the repatriating individual or a representative of a culturally affiliated AOSTC.

VI. Kodiak Alutiiq / Sugpiaq Repatriation Commission

In 2007, the Kodiak Alutiiq community formed a regional repatriation commission to facilitate the return of Alutiiq/Sugpiaq ancestral remains, funerary objects, objects of cultural patrimony, and sacred objects; to ensure the respectful, culturally appropriate treatment of ancestral remains, funerary objects, objects of cultural patrimony, and sacred objects within our homeland; and to educate museums about Alutiiq/Sugpiaq traditions so they may care appropriately for collections that cannot be repatriated.

Known as the Kodiak Alutiiq/Sugpiaq Repatriation Commission, this body and its manual are resources that the Alutiiq Museum staff shall use to help guide NAGPRA activities (e.g., determining cultural affiliation, identifying tribal contacts, resolving disputes). The manual summarizes the Commission's island-wide vision for the repatriation and long-term care of ancestral remains, funerary objects, objects of cultural patrimony, sacred objects, and cultural objects. The manual is available from the Curator of Collections and is shared on the repatriation page of the Alutiiq Museum website. The Kodiak Alutiiq/Sugpiaq Repatriation Commission is also available to share knowledge of Alutiiq traditions and to advise on the respectful treatment of ancestral materials that cannot be repatriated.

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VII. NAGPRA Policy Review

Formal review of this policy will take place at least once every five years from the date of last review. Proposed changes or amendments to this policy shall be brought to the attention of the Alutiiq Heritage Foundation's Board of Directors by the museum's executive director. The AHF Board shall review the proposed changes and enact any revisions they believe to be necessary.

This policy was first adopted by the Alutiiq Heritage Foundation Board of Director on June 6, 2010. Revisions were accepted by the AHF Board on February 20, 2018 and on August 23, 2022.