



SOCIETY FOR AMERICAN ARCHAEOLOGY

February 26, 2024

Ms. Melanie O'Brien
Designated Federal Officer
National NAGPRA Program (2253)
National Park Service
1849 C Street NW
Washington, DC 20240

RE: National NAGPRA consultation database

Dear Ms. O'Brien,

The Society for American Archaeology is closely monitoring the implementation of the recently promulgated revisions to the Native American Graves Protection and Repatriation Act (NAGPRA) regulations and their impact upon stakeholders. One issue that we would like to bring to your attention concerns the National NAGPRA Program's consultation database.

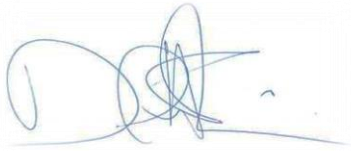
The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 5,500 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

The new regulations will result in a greatly expanded need for institutions to consult with Federally Recognized Tribes and Native Hawaiian Organizations. To do this, they will need a comprehensive and accurate reference to start and continue consultation efforts that are at the core of NAGPRA compliance. After reviewing the current consultation database, it appears that there are no entries for more than half of all Federally Recognized Tribes, while other entries appear to be outdated. For example, the database still lists Alaska Native Corporations even though they are no longer considered entities for NAGPRA purposes, and a number of individuals listed in the database have not been active in NAGPRA work for many years.

NAGPRA, when it functions properly, builds productive relationships between institutions and tribes and secures the proper disposition of covered items. In order for the new regulations and the NAGPRA process to work, however, the consultation database must be current and complete.

We respectfully request that the National NAGPRA Program invest time and resources to update and ensure the accuracy of its consultation database so that NAGPRA stakeholders can use this essential resource with confidence.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sandweiss', with a stylized flourish extending to the right.

Daniel H. Sandweiss, Ph.D., RPA
President