

POLICIES OF COLORADO STATE UNIVERSITY IMPACT STATEMENT



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| <p>Policy Title: Native American Graves Protection and Repatriation Act (NAGPRA) Compliance</p> | <p>Category: 7. Research</p> <p>Policy ID: 7-2001-020</p> |
| <p><input checked="" type="checkbox"/> New Policy <input type="checkbox"/> Revision of Existing Policy</p> | <p>Date Submitted: November 19, 2025</p> |
| <p>Policy Proponent/Owner: Cassandra Moseley, Vice President for Research</p> | <p>Contact(s): TBD</p> |

POLICY DESCRIPTION AND BASIS

This policy establishes institutional procedures for compliance with NAGPRA (Pub. L. 101-601), a federal law requiring the respectful handling, documentation, access, exhibits, and repatriation of Native American human remains, funerary objects, sacred objects, and cultural patrimony. The NAGPRA rule updates from the Department of the Interior, Office of the Secretary, 43 CFR Part 10, Document Number: 2023-27040, effective January 12, 2024, and subsequent updates are more efficiently tracked and adhered to when part of an official University policy. This new policy supports the University’s commitment to ethical research, cultural respect, and legal compliance. The policy aligns with federal regulations and ensures that all university departments, research units, and field programs meet NAGPRA obligations.

REQUIRED RESOURCES

No additional FTE are required. One-time funding for database development, training, and consulting must be identified by the sponsoring unit. The University’s new budget model does not include a central one-time funding reserve unless the structure is revised. Future costs associated with repatriation logistics and stakeholder engagement will remain the responsibility of the performing unit.

ANTICIPATED IMPACTS

- Faculty and staff involved in archaeology, anthropology, environmental management, research, archival collections, museums, and facilities overseeing public displays.

- Students and trainees participating in fieldwork or handling cultural materials.
- Tribal and Native communities and organizations.
- Public stakeholders engaging with university collections.

POLICY DEVELOPMENT

Policy development will include members from the following offices: Office of the Vice President for Indigenous and Native American Affairs; Dean of Libraries; Office of the Vice President for Research, College of Liberal Arts, and Office of General Counsel.

STAKEHOLDER INPUT

Stakeholder input will be solicited from the following groups, in addition to those determined appropriate by the drafting team:

- Faculty Council
- Administrative Professional Council
- Deans, Directors, Departments Heads
- Council of Research Associate Deans
- Native American Advisory Council
- CoSRGE
- CAAG
- Department of Anthropology and Geography, College of Liberal Arts
- CSU Museums (Avenir and Allicar)
- LSC Exhibits Team (Facilities) (Displays within non-academic spaces, such as Lory Student Center)

ADMINISTRATIVE/MANAGEMENT/ASSESSMENT

The policy will be administered on an ongoing basis by the Office of the Vice President for Research and the Office of the President.

PROCEDURES, GUIDELINES AND FORMS

The policy development team will ensure there are appropriate procedures, guidelines, and forms, including:

- Procedures for inventory, consultation, and repatriation
- Standards for handling and documentation

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- Forms for tribal consultation, repatriation requests, and compliance reporting
- Tribal consultation best practices and guidelines

INTERNAL CONTROLS

Inventory systems will be developed that can be audited. Based on the procedures that are developed in support of this policy, these systems will undergo annual metrics and documentation review.

RELATED POLICIES AND REGULATIONS

Native American Graves Protection and Repatriation Act (NAGPRA)

REVIEW AND APPROVAL BY THE PRESIDENT'S CABINET:

APPROVED TO PROCEED TO POLICY DEVELOPMENT

NOT APPROVED

MORE INFORMATION NEEDED:

By: 
Brendan Hanlon (11/24/25 12:52:46 MST)
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Vice President for University Operations

Date: 11/24/25