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Addressing Split Collections in NAGPRA Compliance

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Abstract
Legacy collections frequently originate from Indigenous archaeological sites with extensive histories of investigation and removal by numerous institutions and individuals. These "split" collections complicate institutional compliance with the Native American Graves Protection and Repatriation Act (NAGPRA; 25 U.S.C. § 3001-13) , in part by hindering the identification of cultural items, including associated and unassociated funerary objects. In aligning with the spirit of NAGPRA and following guidance received during consultation with Tribal Nations, institutional NAGPRA practitioners strive to repatriate the Ancestors removed from these locations whole, both in body and cultural items, facilitating a respectful return to living communities. Moreover, collaborating across institutions and in coordination with Tribal Nations has the potential both to lessen the burden on Tribal Nations and minimize repetitive trauma brought about by multiple repatriations of Ancestors and cultural items from the same site. Accomplishment of this repatriation goal often requires cross-institutional collaboration to reconcile these legacy "split collections." In this article, we present the roadmap developed and used by the University of Wisconsin–Oshkosh and the University of Wisconsin–Milwaukee for repatriation with split collections, with some considerations for fruitful interinstitutional collaboration.

Resumen
Las colecciones heredadas frecuentemente se originan en sitios arqueológicos indígenas con extensas historias de investigación y remoción por numerosas instituciones e individuos. Estas colecciones "divididas" complican el cumplimiento institucional de la Ley de Protección y Repatriación de Tumbas de los Nativos Americanos (NAGPRA; 25 U.S.C. § 3001-13) en parte al dificultar la identificación de objetos culturales, incluidos los objetos funerarios asociados y no asociados. En alineación con el espíritu de la NAGPRA, y siguiendo la orientación recibida durante la consulta con las Naciones Tribales, los practicantes institucionales de NAGPRA se esfuerzan por repatriar a los Ancestros removidos de estos lugares en su totalidad, tanto en cuerpo como en Pertenencias, facilitando un retorno respetuoso a las comunidades vivas. Además, la colaboración entre instituciones, y en coordinación con las Naciones Tribales, tiene el potencial de reducir la carga sobre las Naciones Tribales y minimizar el trauma repetitivo causado por múltiples repatriaciones de Ancestros y objetos culturales del mismo sitio. La consecución de este objetivo de repatriación a menudo requiere colaboración interinstitucional para reconciliar estas colecciones heredadas "divididas." En la siguiente pieza, presentamos la hoja de ruta que la Universidad de Wisconsin-Oshkosh (UWO) y la Universidad de Wisconsin-Milwaukee (UWM) han desarrollado y utilizado para abordar la repatriación con colecciones divididas, con algunas consideraciones para una colaboración interinstitucional fructífera.

Keywords: archaeological collections; legacy collections; NAGPRA; repatriation

Palabras clave: colecciones arqueológicas; colecciones heredadas; NAGPRA; repatriación

Archaeological legacy collections are those assemblages within institutions, such as universities, museums, and federal repositories that typically lack clear ownership documentation and fall short of

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current professional standards for housing and documentation (Archaeological Collections Consortium 2016). Legacy collections frequently originate from Indigenous archaeological sites with extensive histories of investigation and removal by numerous institutions and individuals. These activities often result in the dispersal of cultural items[1] and human remains (hereafter Ancestors) across multiple institutions, many of which represent museums as defined under the Native American Graves Protection and Repatriation Act (NAGPRA; 25 U.S.C. § 3001-13). In some instances, Ancestors and the cultural items placed with them at the time of burial become physically separated from each other within an institution or among different institutions. These "split" collections complicate institutional compliance with NAGPRA in part by hindering the identification of cultural items, including associated and unassociated funerary objects, sacred objects, and objects of cultural patrimony. In aligning with the spirit of NAGPRA, and following guidance received during consultation with lineal descendants, federally recognized Native American Tribes, and Native Hawaiian organizations (hereafter Tribal Nations), institutional NAGPRA practitioners strive to repatriate the Ancestors removed from these locations whole, both in body and cultural items, facilitating a respectful return to living communities. Moreover, collaborating across institutions in coordination with Tribal Nations has the potential both to lessen the burden on Tribal Nations and minimize repetitive trauma brought about by multiple repatriations of Ancestors and cultural items from the same site. Accomplishment of this repatriation goal often requires cross-institutional collaboration to reconcile these legacy "split collections." In this article, we present the roadmap developed and used by the University of Wisconsin–Oshkosh (UWO) and the University of Wisconsin–Milwaukee (UWM) to approach repatriation of split collections from the same archaeological site, with some considerations for fruitful interinstitutional collaboration.

We define split collections to include "situations in which objects from the same project are placed in separate repositories, or the objects and associated records are stored in separate places" (Knoll and Huckell 2021:17), as well as collections that derive from different excavations of the same site, such as the examples discussed later. Split collections also commonly represent legacy or orphaned collections that generally do not meet current "best practice" curation standards and have little associated documentation in the possession and control of an institution (MacFarland and Vokes 2016).

There is no requirement in NAGPRA or its regulations (43 CFR Part 10) requiring the reunification of Ancestors, cultural items, or both before repatriation. However, the workflows that UWO and UWM have developed, following guidance received during tribal consultations[2] and based on the intertwined institutional history of regional archaeological investigations, require interinstitution collaboration to fulfill our promises to Tribal Nations and, one hopes, lessen their burden. Our approaches have varied depending on the nature of the split collections but include two common elements: collaboration with Tribes and other NAGPRA specialists and the collection of information about site histories, individual archaeologists, and formal or informal repositories. We outline these approaches as applied by UWO, UWM, and the Universities of Wisconsin (the Wisconsin state university system that includes 13 public institutions) as a whole.

The University of Wisconsin—Milwaukee and University of Wisconsin—Oshkosh Approach to Split Collections

Wisconsin is hardly unique in the United States for its more than 100-year history of archaeological investigations. Throughout this long history, many well-known archaeological sites (hereafter sites) were revisited over and over by generations of archaeologists working at a variety of institutions, professional (compliance-related) archaeologists, and avocational archaeologists, collectors, and the public. Consequently, multiple institutions may have removed cultural items or Ancestors from the same site, sometimes being unaware of earlier removals. Furthermore, Wisconsin museums and universities, similar to many other institutions during the mid-twentieth century, gave or loaned material to other researchers or institutions on an ad hoc basis and through verbal agreements. These practices have resulted in fragments of a site excavated by one institution ending up in another institution with no record of being there, thus underscoring the importance of institutional intellectual control.

At UWO, the institutional NAGPRA coordinator is a tenured faculty member within the Department of Anthropology, and at UWM, the NAGPRA coordinator is the director of the Archaeological Research

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Laboratory Center and a faculty member in the Anthropology Department. Each reports to the senior leadership at their university housed in the Office of the Chancellor. At both institutions, the NAGPRA leadership roles arose organically, given the depth and scope of NAGPRA concerns within the home departments of each coordinator. Beginning in 2022, UWO and UWM began monthly intertribal consultation meetings, inviting Tribal Nations that were likely affiliated with the collections housed at each institution. Nearly 80 Tribal Nations with Aboriginal land ties to Wisconsin are invited to these monthly consultations.[3]

Both UWM and UWO have recently come to terms with the scope and complexity of their institutions' NAGPRA compliance shortcomings. Decades of well-intentioned academic, compliance, and salvage archaeological research conducted by UWO and UWM have resulted in extraordinarily large archaeological assemblages (cultural items and records) that are mostly undocumented. Both UWO and UWM function as regional archaeological repositories, with UWM more formally established as such. Both institutions have historically lacked the operational and financial support needed to provide effective curatorial care for and full intellectual control of their archaeological assemblages. Moreover, common practices of ad hoc loans between the institutions, often with little or no documentation, have hindered recent (post–2020) attempts at intellectual control. In this article, we present several examples of how UWO and UWM have worked collaboratively with Tribal Nations to identify archaeological assemblages split across institutions, reunite Ancestors and their cultural items, facilitate identification of cultural items, and strive to lessen the burden and trauma to Tribal Nations.

The two scenarios presented next show how the UWO and UWM have coordinated efforts to facilitate repatriation while emphasizing the importance of tribal consultation in decision-making. Moreover, discussions with the National NAGPRA Program reiterated the importance of finding the most appropriate pathway, consistent with guidance received during tribal consultation, while not allowing legal control to become a barrier to repatriation. The examples derive from archaeological sites located in and around the Middle Fox River Passageway, a riverine-lacustrine network that links the Great Lakes to the Mississippi River Valley in east-central Wisconsin. The Middle Fox River Passageway harbors a dense concentration of archaeological sites from circa 12,000 BP to historic times that have been subject to archaeological study since the late nineteenth century.

Scenario #1: Site Investigated by Multiple Institutions over Time with Assemblages Split among Multiple Institutions

Early collaborations between UWO and UWM identified several cases where both institutions held assemblages from the same site known to have Ancestors removed and suspected to have cultural items. Two such cases are described, along with the steps that UWO and UWM took to facilitate the NAGPRA process (Figure 1).

Pipe Site Complex. Based on archaeological and historical documentation, the Pipe Site complex (sites 47-FD-0010 and 47-FD-0013) encompasses an extensive village and a mortuary complex that includes mounds along Lake Winnebago, harboring Oneota (AD 1200–1600) and Woodland Tradition (500 BC–AD 1100) occupations, as well as the Menominee Village of Calumet (AD 1620–1834). Between the early 1900s and 2022, the site was disturbed on multiple occasions by a host of individuals and organizations. UWM's site research, including a review of primary source documents and original field documentation (such as unpublished site reports, field notes, and Wisconsin Historic Preservation Database site files), identified several institutions as holding assemblages from the Pipe Site complex, including UWM, UWO, and the Milwaukee Public Museum (MPM). UWM held assemblages from multiple years of academic research, avocational collector donations, and archaeological salvage operations. The UWO collections derived from compliance-driven studies and those of the Milwaukee Public Museum from early (pre-1950) removals. This research also revealed multiple (at least three) ad hoc "loans" between UWO and UWM, so that Ancestors and items documented as being at UWO were physically located at UWM. The information gleaned from the site histories, documented in a "site history" technical document (Haas et al. 2024), was shared with Tribes during a UWO–UWM monthly intertribal consultation meeting. Based on guidance received during this consultation, assemblages under the control of UWO were physically and legally transferred to UWM to facilitate the

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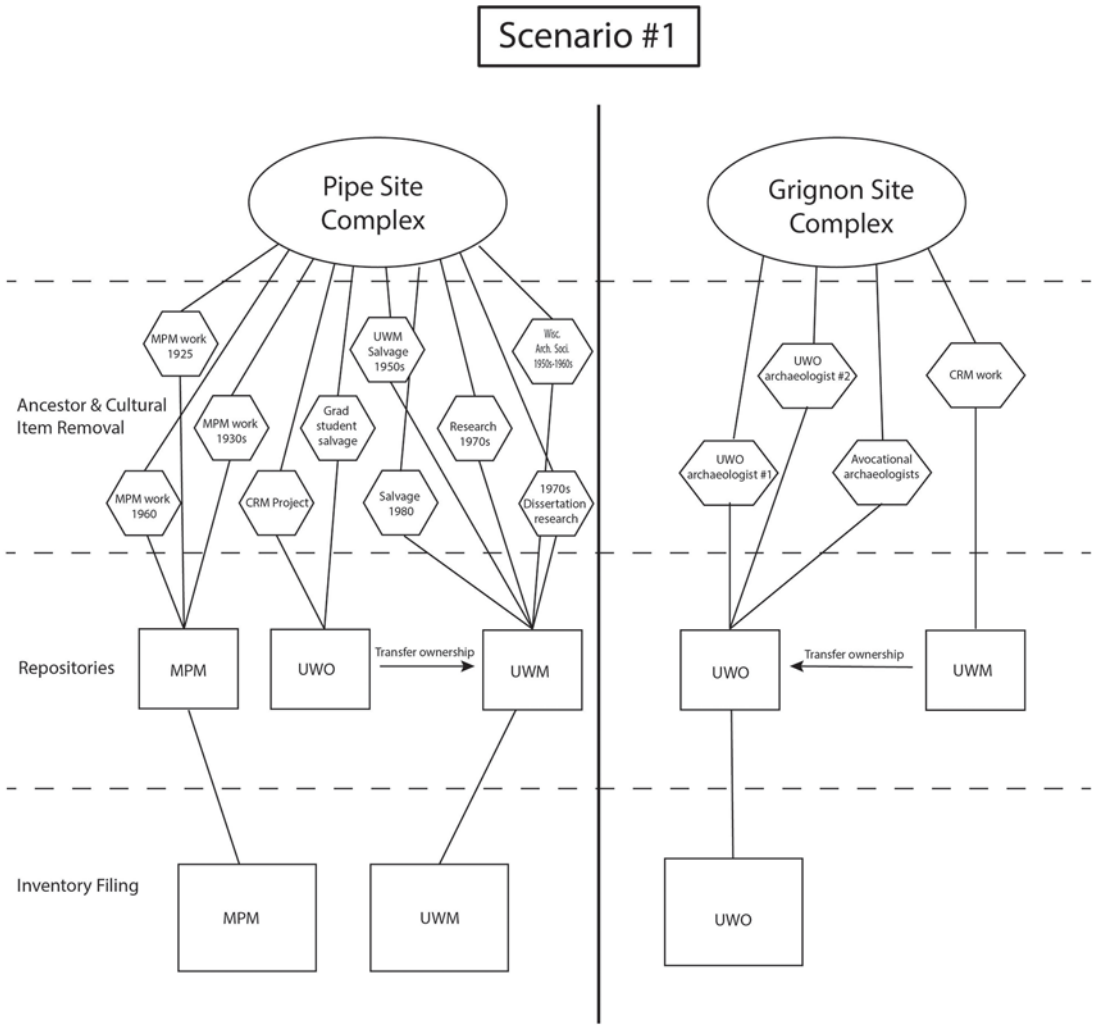


Figure 1. NAGPRA process for cases when sites have been investigated by multiple Institutions with assemblages split among Institutions.

NAGPRA process. UWM and MPM coordinated with each other on subsequent consultation meetings, with each institution (UWM and MPM) developing NAGPRA inventories and notices of inventory completion.

Grignon Site Complex. Grignon 1 and 2 (47-WN-0118 and 47-WN-0119) are a village and cemetery complex that have evidence for use from 12,000 BP through the Oneota period. Assemblages were collected by G. Richard Peske in 1966 and J. D. Volkman in 1972, working under the auspices of UWO. Additionally, Richard (Dick) and Carol Mason, acting as avocational archaeologists, had amassed a private collection from this site that they donated to UWO in 2018. After a review of UWO and UWM site holdings, UWM identified archaeological assemblages from the Grignon site relating to a compliance-driven project completed in the 1990s (Clark and Overstreet 1995). Importantly, the archaeological materials from the site at UWM were not immediately recognized as NAGPRA-eligible, given the absence of Ancestors and the materials' (archaeological) interpretation as village-related deposits. On learning that the Ancestors had already been removed from the site and were present at UWO, UWM prepared a site history, providing information regarding the cultural items and their associated archaeological context. This information was shared with Tribes during consultation, and they were

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able to identify cultural items from the UWM assemblage. Following guidance received during the consultation, UWM transferred physical custody and legal control to UWO to facilitate the NAGPRA process.

Scenario #2: Site Investigated by a Single Institution/Investigator with Assemblages Split among Multiple Institutions

Another all-too-common scenario is that of a legacy collection spread across multiple museums. This section presents two instances where the UWO team encountered NAGPRA collections split between universities and local historical societies. Local historical societies exist in the gray zone of state cultural heritage bodies and receive varying financial support from county, village, or state government. Some historical societies maintain a "brick and mortar" building with archives and collections storage, whereas others are simply represented by interested community members. This variation contributes to the confusing relationship between these local societies and the state agency—the Wisconsin Historical Society has more than 400 affiliate societies[4]—and also means that there is not a singular approach to collaborating with local historical societies. Instead, each one must be considered in terms of its own unique collection holdings and society history (Figure 2). In the two cases presented in this scenario, deep research by the UWO team into the history of the investigations at the sites led to the discovery of collections split among historical societies.

Historical Society 1. One group of Ancestors that UWO needed to reassess were those removed from the Rush Lake area in Winnebago County. These Ancestors were excavated from a mound group in the 1950s by Jack Steinbring, at the time a graduate student at the University of Wisconsin–Madison. Steinbring later took the Ancestors with him to Canada where he was teaching and then donated them to UWO around 1994. However, while researching the history of this collection, UWO determined that Steinbring also donated all the artifacts he removed from these sites to Historical Society 1, because he had long-standing connections with the town where this historical society is located. Yet, there was no official documentation that he donated those artifacts to the historical society; the information that they were there came to UWO by word of mouth.

Historical Society 1, located in the Lake Winnebago region, maintains a robust archive and small museum, with one part-time employee and an engaged board of directors. UWO proposed that the complete collection donated by Jack Steinbring to the historical society be transferred on loan to UWO to reassociate with the Ancestors with whom they were buried, as well as to complete a NAGPRA inventory with the intent of repatriation. After approval by UWO's Tribal partners, UWO and Historical Society 1 entered into a formal Memorandum of Understanding in which the UWO NAGPRA team would complete the full legal NAGPRA process on behalf of both UWO and Historical Society 1, and any artifacts not subject to NAGPRA would be returned to the historical society once the process was completed.

The fortuitous and chance revelation that Historical Society 1 held collections from these sites was an excellent lesson for UWO's continued work with legacy collections. The UWO NAGPRA team then contacted every local historical society in the region to identify whether they held any archaeological collections and whether there was any overlap with sites held by UWO. This action led to another collaboration with a local historical society.

Historical Society 2. In the early 1970s, during landscaping work in the town of Winneconne (Winnebago County), burials were uncovered and salvaged by an archaeologist affiliated with UWO. Records were found that stated that UWO kept the artifacts found in the burials, and the Ancestors were given to Historical Society 2. After being contacted by UWO, Historical Society 2 confirmed having human remains from an archaeological context. Unlike Historical Society 1, Historical Society 2 does not have a museum or collections storage, except for space in the local library. The members were very interested in returning the Ancestors but were unsure how to do so. Following consultation and Tribal guidance, UWO agreed to partner with Historical Society 2 to ensure that these Ancestors were reunited with their cultural items and to complete the necessary NAGPRA process. The UWO NAGPRA team is in the process of completing the full legal NAGPRA process on behalf of both UWO and Historical Society 2.

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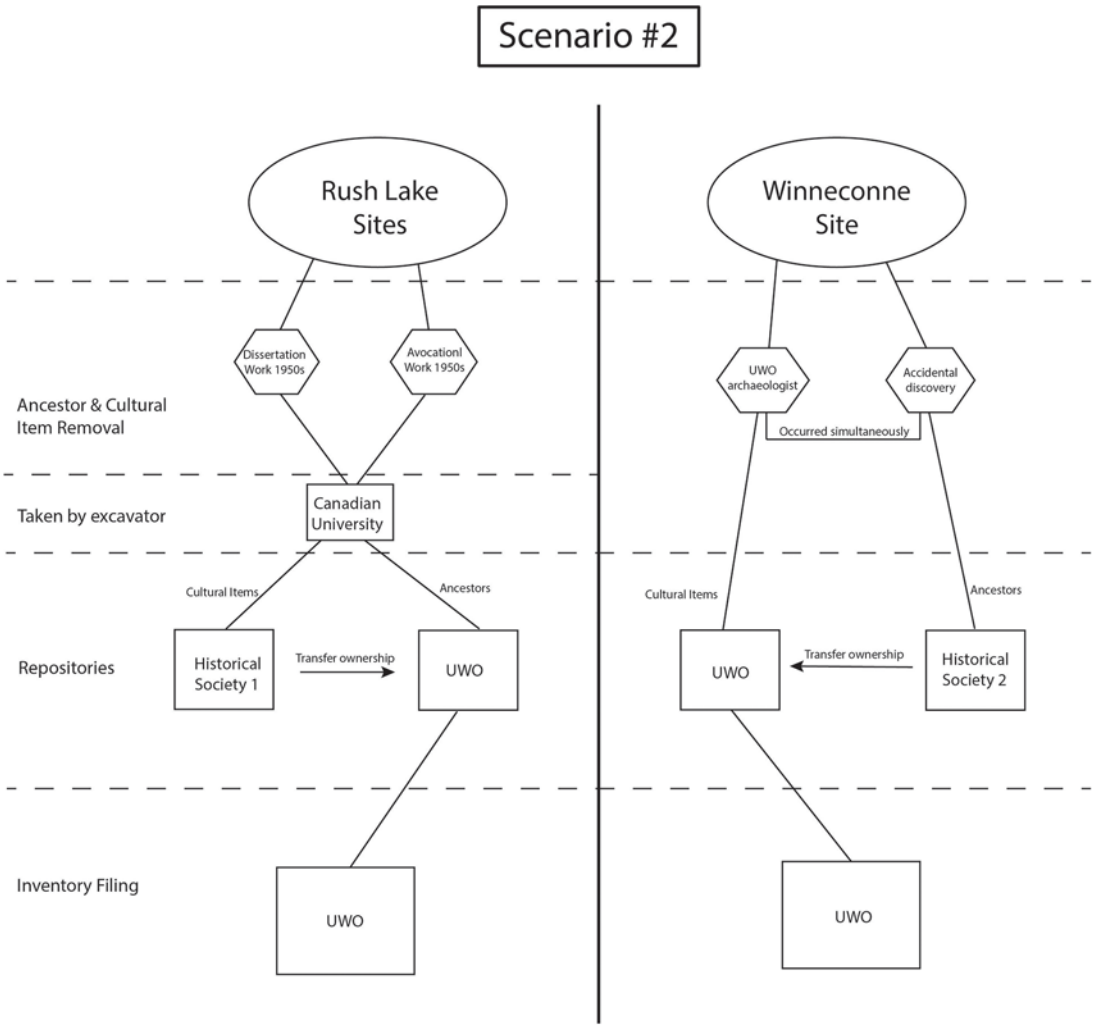


Figure 2. NAGPRA process for cases when sites have been investigated by a single entity with assemblages split among multiple institutions.

Discussion

We recommend the following steps to facilitate repatriation of split collections. We assume that, before addressing split collections, an institution has established relationships with Tribal Nations through consultation and has secured "intellectual control" of archaeological collections under their care, identifying and understanding the archaeological sites present within their holdings. Consulting with Tribal Nations and knowing the archaeological sites present within an institution's holdings are critical and necessary first steps.

Collaborate among Institutions with Regional Holdings

Identification of NAGPRA items and repatriation are facilitated by coordination among institutions that hold archaeological collections from the same region. NAGPRA programs are typically understaffed and underfunded. Sharing resources with other institutions allows for efficiencies by eliminating duplication of efforts across institutions and has the potential to lessen the burden on Tribes. Involvement in local/regional communities of practice, communication with other NAGPRA practitioners (across and

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within university systems), and establishing professional relationships with other NAGPRA coordinators are encouraged.

In 2021, the NAGPRA coordinators at UWO, UWM, UW–La Crosse (Mississippi Valley Archaeology Center), and UW–Madison began informal discussions regarding each institution's NAGPRA compliance efforts. These informal discussions eventually led to the formation of the Wisconsin NAGPRA Community of Practice. Through these cross-institutional discussions, it quickly became apparent that these institutions typically housed collections from the same archaeological site, especially for certain regions in Wisconsin. The NAGPRA coordinators collectively established a spreadsheet, in a protected, web-accessible shared folder, which listed the archaeological sites presently known in the collections housed at each institution. The list is a living document and updated as institutional collection management systems are refined. UWM and UWO routinely share information with Tribal Nations regarding archaeological sites within their repositories during consultation. Having the information as a living document is particularly important for these two universities, given their ongoing work of refining intellectual control. Specifically, both institutions continue to identify discrete sites in their collections by cleaning up their respective collections' information management system databases, and both continue the necessary work of opening boxes and confirming contents with Tribal consent and guidance. Also in the shared folder are research documents pertaining to various sites, such as cultural resource management reports, primary source citations, and preliminary narratives of site investigation histories. These shared "research resources" prevent duplication of efforts across institutions, creating efficiencies for our respective (and small) NAGPRA teams and limited budgets.

Cross-institutional sharing of site lists among NAGPRA coordinators is a key step in the identification of split collections. Baseline information in the site lists, such as site number (Smithsonian code), site name, location (county), known investigators and institutional affiliations, and presence/absence of NAGPRA items (yes/no), is sufficient to identify possible split collections without revealing culturally sensitive information. The Midwest NAGPRA Community of Practice has also initiated a comprehensive listing of regional archaeological sites by institutions to facilitate collaboration. The project is in its infancy, but the hope is to identify collections split across multiple institutions and take steps to coordinate the NAGPRA process and facilitate repatriation.

A secure but easily accessible web-based folder is an effective means to share documents and resources. Several existing platforms such as Office 365, Dropbox, and Google Drive offer secure file sharing. A key document to include as part of the shared folder is a generalized list of sites present at each institution such as those described earlier. Depending on Tribal guidance, a brief description of the contents of the assemblage, including the presence/absence of NAGPRA-eligible items and of Ancestors, may also be included as part of the site information.

Collaboration among NAGPRA practitioners has the potential to lessen the burden on Tribes by coordinating the NAGPRA process for the same site with assemblages split across multiple institutions. For example, Indiana University and the University of Illinois–Urbana are each coordinating NAGPRA efforts for high-profile archaeological sites in Illinois. UWM is beginning such coordination for the Aztalan site, a National Historic Landmark, in Wisconsin. In other cases, institutions have formed a consortium to facilitate the NAGPRA process. As emphasized throughout this article, consulting with Tribes and following their guidance are essential precursors to such coordinated efforts. There may be cases where Tribal guidance is to not proceed in this manner.

Develop and Share Comprehensive Site Histories

Both UWO and UWM have realized the benefit of developing comprehensive site histories, especially for legacy collections with limited (or no) documentation, for locating assemblages split across multiple institutions (including local historical societies) and identifying possible NAGPRA items.

Archaeological documentation is notoriously problematic, with few investigated sites described in peer-reviewed and published formats. Compliance-driven studies are typically detailed in technical reports (the cultural resource management [CRM] "gray" literature) and academic research in unpublished theses and dissertations, with the work of many field schools underreported (see Bendremer 2024) and "salvage"-era excavations lacking any written summaries or synthetic summaries. State-level

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databases, such as the Wisconsin Historic Preservation Database maintained by the Office of the State Archaeologist, provides a record of reported sites and some information on previous investigations at these sites. These databases, however, rely on the investigators to report the work completed at a site, with limited regulatory authority (at least in Wisconsin) for enforcement. Tracking the histories of individual archaeologists and noting their years of active work and institutional affiliations by year are also helpful in determining where collections may be located. Given these limitations, developing individual site histories during the NAGPRA process marks a key step in the attempt to identify split collections.

We recommend that museums create standardized site-specific documentation that goes beyond what is typically recorded on traditional site forms. Key information in a site history document includes the following:

- History of excavations at and removals from the site
- The general archaeological/historical context, which includes time periods and archaeological cultural affiliations
- Citations for the primary source documents (if extant)
- Delineation of the key investigators associated with the site
- Identification of where collections should be or are likely to be located

State databases are often a good initial place to obtain information about archaeological sites. It is also important to report new information identified during this research to the state database. UWO developed site excavation and collection histories out of necessity, given the lack of documentation for legacy collections from multiple sites. By doing so, it located cultural items at a local historical society from a site from which Ancestors had been removed and that are now under its control.

Use Site Histories to Understand the Archaeological Context and Identify Potential Cultural Items

An institution holding Indigenous assemblages has a responsibility to understand the archaeological context of those items, where possible, so it can determine whether some objects might be cultural items. Site histories also develop basic information regarding the intra-site proveniences that can help in the reunification of Ancestors and cultural items. Site contextual information can facilitate identification of cultural items that may have gone unrecognized as such by archaeological investigations, have become physically separated from Ancestors due to post-excavation curatorial practices, or both. Institutions should not assume that they do not have NAGPRA-eligible items because they only have "artifacts" and not Ancestors. The Grignon site complex and Rush Lake assemblage demonstrate that curation practices may result in Ancestors being held at one institution (UWO) and physically separated from cultural objects at another institution (Historical Society 1).

Identify Institutions and Other Entities That May Have Assemblages from the Site or Locations Near the Site

Researching the site histories and identifying the key individuals associated with the investigations at the site facilitate locating related assemblages at other institutions. Reaching out to these institutions can lead to the reunification of Ancestors with cultural items and the identification of cultural items that may have gone unrecognized due to physical separation from the Ancestors or the loss of information regarding intra-site provenience.

Institutions that house archaeological collections from the late nineteenth and early twentieth centuries may not have their collections organized by Smithsonian trinomial site number codification system because this system was not developed until the 1940s. In these cases, searching by locational information (such as county or major landmarks) may help associate collections with a site. Sometimes the landowner at the time of removal is noted; a review of plat maps from that period may subsequently provide a location that can then be associated with a site. For example, UWM routinely collaborates with the MPM for Wisconsin sites, given that the MPM has holdings from early investigations. Catalog records from the museum's Wisconsin county holdings are examined when searching for split collections. This technique allowed UWM to locate additional holdings from the Pipe Site complex at the MPM that were recorded not under the site number but rather under the name of the county.

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Taking the Path Forward through NAGPRA Compliance

Information gathered about the Ancestors and possible cultural items should be shared with Tribal Nations during consultation, with all institutions represented at the consultation. This information also includes how the collections (and Ancestors) came to be at the institution and intra-site contextual information. The latter information may enable Tribal Nations to identify cultural items, especially those cultural items that may have become disassociated with Ancestors through excavation, curatorial practices, or both. It is recommended to provide site histories and a synthetic overview of the information in advance of consultations whenever possible.

During the consultation, one should discuss the logistical next steps to facilitate the NAGPRA process. The path forward is dependent on many factors, the most important of which are Tribal preferences. In some cases, discussions with the National NAGPRA Program also occur. UWM and the UWO have used various pathways to facilitate repatriation, including the following:

- One institution takes the lead, and legal control over collections at other institutions is transferred to the lead institution. The lead institution prepares the draft Inventories and draft Notices of Inventory Completion (NIC). All institutions continue to consult with Tribal Nations and work collaboratively.
- Each institution retains control over their respective collections, and each institution develops a separate draft Inventory and NIC. The institutions, however, work in collaboration with each other and in coordination with Tribal Nations.

There is also a hybrid version of those two options involving three or more institutions. For example, for the Pipe Site complex, following Tribal guidance, the UWO transferred legal control to UWM, and UWM is working in coordination with MPM to facilitate repatriation through the NAGPRA process. Following publication of the notices in the *Federal Register* and transfer of legal control to Tribes, institutions continue to coordinate efforts, in consultation with Tribes, to facilitate the physical transfer. Lastly, a consideration outside the legal requirements is to physically reunite Ancestors and cultural items at one institution when requested by Tribes, regardless of legal control.

Summary

Legacy archaeological collections frequently originate from Indigenous archaeological sites with extensive histories of investigation and removal by numerous institutions and individuals. These "split" collections complicate institutional compliance with NAGPRA in part by hindering the identification of cultural items, including associated and unassociated funerary objects. There is no requirement in NAGPRA or its regulations (43 CFR Part 10) requiring the reunification of Ancestors, cultural items, or both before repatriation. However, the workflows developed by UWO and UWM, following guidance received during tribal consultation and based on the intertwined institutional history of regional archaeological investigations, necessitate interinstitution collaboration to fulfill our promises to Tribal Nations and, one hopes, lessen their burden. Our approaches have varied depending on the nature of the split collections.

The approaches described here have been guided by both universities' partnerships with Tribal Nations. At the onset of each program's recommitment to NAGPRA, bimonthly consultations are spaces to outline the situations faced by each university and receive guidance on next steps. This transparency has facilitated the leeway necessary to go beyond the minimum legal requirements of NAGPRA compliance and allowed each institution to center the humanity of the Ancestors throughout the process and to consider the full history of archaeological removals and their impact on living communities. This history often includes multiple events of removal, separation of cultural items from their owners, or even separation of individuals from themselves. Although there is no requirement in NAGPRA or its recently (January 2024) revised regulations (43 CFR Part 10) requiring the reunification of Ancestors, cultural items, or both before repatriation, collaboratively addressing split collections in consultation with Tribal Nations is in alignment with the regulations, especially the duty of care provision (see Final Rule 88 FR 86452).

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Notes

1. The term "cultural items" refer specifically to funerary objects, sacred objects, and objects of cultural patrimony as defined under NAGPRA.
2. UWM and UWO regularly consult with Tribal Nations that have aboriginal lands in what is now Wisconsin, including Assiniboine and Sioux Tribes; Bad River Band of Lake Superior Tribe of Chippewa Indians; Bay Mills Indian Community; Cayuga Nation; Cheyenne River Sioux Tribe; Chippewa Cree Indians of the Rocky Boys Reservation; Citizen Potawatomi Nation; Crow Creek Sioux Tribe; Flandreau Santee Sioux Tribe; Forest County Potawatomi Community; Grand Traverse Band of Ottawa and Chippewa Indians; Hannahville Indian Community; Ho-Chunk Nation of Wisconsin; Iowa Tribe of Kansas and Nebraska; Iowa Tribe of Oklahoma; Keweenaw Bay Indian Community; Kickapoo Traditional Tribe of Texas; Kickapoo Tribe in Kansas; Kickapoo Tribe of Oklahoma; Lac Courte Oreilles Band of Lake Superior Chippewa Indians; Lac du Flambeau Band of Lake Superior Chippewa Indians; Lac Vieux Desert Band of Lake Superior Chippewa Indians; Little River Band of Ottawa Indians; Little Shell Chippewa Tribe; Little Traverse Bay Bands of Odawa Indians; Lower Brule Sioux Tribe; Lower Sioux Indian Community; Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Bois Forte Band (Nett Lake); Fond du Lac Band of Lake Superior Chippewa; Grand Portage Band of the Minnesota Chippewa Tribe; Leech Lake Band of Ojibwe; Mille Lacs Band of the Minnesota Chippewa Tribe; Minnesota Chippewa Tribe; White Earth Band of the Minnesota Chippewa Tribe; Brothertown Indian Nation; Burt Lake Band of Ottawa and Chippewa Indians; Grand River Band of Ottawa Indians; Nottawaseppi Huron Band of Potawatomi; Oglala Sioux Tribe; Oneida Nation of New York; Oneida Nation; Onondaga Nation; Otoe-Missouria Tribe of Indians; Ottawa Tribe of Oklahoma; Peoria Tribe of Indians of Oklahoma; Pokagon Band of Potawatomi Indians; Prairie Band Potawatomi Nation; Prairie Island Indian Community; Red Cliff Band of Lake Superior Chippewa Indians; Red Lake Band of Chippewa Indians; Rosebud Sioux Tribe; Sac and Fox Nation of Missouri in Kansas and Nebraska; Sac and Fox Nation; Sac and Fox Tribe of the Mississippi in Iowa; Saginaw Chippewa Indian Tribe of Michigan; Saint Regis Mohawk Tribe; Santee Sioux Nation; Sault Ste. Marie Tribe of Chippewa Indians; Seneca Nation of Indians; Seneca-Cayuga Tribe of Oklahoma; Shakopee Mdewakanton Sioux Community (Prior Lake); Sisseton-Wahpeton Oyate; Sokaogon Chippewa Community (Mole Lake Band); Spirit Lake Tribe; St. Croix Chippewa Indians of Wisconsin; Standing Rock Sioux Tribe; Stockbridge Munsee Community; Osage Nation; Tonawanda Seneca Nation; Turtle Mountain Band of Chippewa Indians; Tuscarora Nation; Upper Sioux Community; Winnebago Tribe of Nebraska; and Yankton Sioux Tribe.
3. We have chosen not to list all collaborators involved in consultation because Tribal Nations have variable preferences regarding the privacy of ongoing NAGPRA work.
4. Relationship described in Wis. Stat. §44.03.

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