



## **I. Impact and Service: University of Montana NAGPRA, Repatriation, Stewardship Team's Activities Planned for the 2025-2026 Academic Year**

Current activities on the to-do list include:

- Work with Tribal Historic Preservation Offices (THPOs), Culture Committees and Departments to set up Research Assistant (RA) and intern student team.<sup>1</sup>
- Team holds weekly meetings, including those with THPOs [campus leaders and OCHE reps invited].
- Team reviews and signs NDA agreement(s) and follows relevant handling protocols as required by each Indigenous nation.
- Team works on shareable cultural affiliation database (Microsoft Teams platform); students assigned to each THPO will focus on specific issues/questions to update the database according to consultation feedback.
- Team works with UM SafetySmart Program to make plans for X-ray fluorescence (XRF) testing to identify and [make plans to mitigate] pesticide contamination of cultural collections; results to be shared with THPOs and other institutions in the MUS system to make plans for workplace safety and NAGPRA legal/disclosure requirements.
- Team works with other institutions in the Montana University System (MUS) to group collections from various sites/places that have been separated; this is intended to streamline repatriation processes and prevent the need for multiple repatriation requests, claim letters, and transfer of control documents.
- Team will work with other MUS institutions, the Montana Burial Board, and the State Historic Preservation Office.

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<sup>1</sup> NOTE: The student team will be getting hands-on experience working as repatriation and collections assistants and liaisons, guided by mentors here at UM who have already been working as liaisons and stewards of the cultural collections. We expect to have 8 RA contracts in process during the 2025-2026 AY. During the Fall of 2025 and Winter 2026, we onboarded most of the students in positions designated for each of the Nations in Montana and hired interns to assist with these efforts.

- Legal specialist(s) on the team will track nationwide consultation activities under the new (2024) NAGPRA regulations to determine applicable actions to our work in Montana.
- Team works with UM Legal and THPOs to finalize Repatriation Policy and Procedures (which can be shared with other institutions in the MUS system). Policy is written, but procedures to be outlined include: 1) making sure that directors/university leaders/decision-makers are present for consultation meetings; 2) creating guidelines for transfer of control/stewardship documents; 3) creating guidelines for Freedom of Information Act (FOIA) requests (e.g., to address Museum of the Rockies' current, specific request for assistance); 4) working with THPOs, legal cultural heritage specialists, and UM Law School's Indian Law Clinic to develop documents for each THPO that will assist them with repatriation processes that align with new (January 2024) NAGPRA regulations; 5) consulting with THPOs and Culture Committees to make sure the procedures have case-by-case flexibility to honor and respect the diversity of situations; and 6) other activities TBD as the UM team takes direction from each THPO/Culture Committee.
- MORE TO ADD AS OUR WORK CONTINUES!

## **II. Impact and Service: University of Montana NAGPRA, Repatriation, Stewardship Team's Previous and Ongoing Statewide and International Activities**

Below is an abbreviated list of the statewide activities our NAGPRA team has led, hosted, or facilitated from Spring 2023 when UM's first permanent full-time NAGPRA-Repatriation Coordinator started to the present. They are delineated into the categories of 1) **THPO Consultation**, 2) **Meetings/Summits**, and 3) **Educational Outreach**.

### **1. THPO Consultation**

- *December 2025-January 2026* – UM Team created drafts Notices of Inventory Completion (NICs) for NAGPRA cases and shared with THPOs to review as a follow-up to previous meetings/discussions of these cases
- *September-November 2025* – UM Team held meetings with regional THPOs to review student team tasks and consultation updates
- *August 2025* – UM Team traveled to Billings to meet with Crow THPO for consultation visit

- *August 2025* – UM Team invited to **Northern Cheyenne** Reservation to participate in ceremony, cultural visits
- *August 2025* – UM Team meets with THPOs about OCHE funding
- *July 2025*: Courtney Little Axe in consultation meetings with **Northern Cheyenne** and **Crow** THPOs
- *April 2025*: Courtney Little Axe and Lisa Hunt met with **Mandan Hidatsa and Arikara Nation** (Fort Berthold, North Dakota) to once again repatriate more ancestors and belongings
- *Winter 2024*: Posted Notice of Inventory Completion on the Federal Register and in the middle of planning follow up for repatriation with **Mandan Hidatsa Arikara Nation** (Fort Berthold, North Dakota)
- *Winter 2024*: Hosted **Crow** THPO
- *September 2024*: Courtney Little Axe and Lisa Hunt traveled to **Mandan Hidatsa Arikara Nation** (Fort Berthold, North Dakota) to meet with the THPO, NAGPRA Coordinator, NAGPRA consultant, and elders to repatriate ancestors, belongings, and archaeological collections from the River Basin Surveys (1945-1969)
- *November 2023*: Hosted **Fort Belknap** THPO
- *October 2023*: Hosted/assisted with **Blackfoot Confederacy**, Knowledge Keepers (in consultation with Blackfeet THPO)
- *October 2023*: Hosted **Confederated Salish Kootenai** THPO
- *October 2023*: Hosted **Fort Peck** THPO
- *October 2023*: Hosted **Nimipuu (Nez Perce)** Spiritual Leader
- *October 2023*: Hosted **Northern Cheyenne** Delegation (THPO, Culture Commission, Elders)
- *Summer 2023*: Traveled to **Fort Peck** THPO for 3-day THPO and NAGPRA Coordinator Invitational
- *Summer 2023*: Met with **Mandan, Hidasta, and Arikara Nation** representatives and the US Army Corps of Engineers to discuss and negotiate repatriation plans for Smithsonian River Basin Survey collections

## 2. UM Hosted Meetings/Summits

- *February 2026: Émano ‘ eotseo ‘o* (They United Together) **Northern Cheyenne Gathering**
- *January-May 2026:* Planning underway for May 2026 **NAGPRA Training and Conference** (in partnership with Association on American Indian Affairs, Your Neighborhood Museum, Mellon Foundation)
- *January-April 2026:* Planning underway for April 2026 **Heritage Collections Board** meeting
- *April 2025:* Planned, coordinated, and hosted **Heritage Collections Board** meeting
- *April 2025:* Planned, coordinated, and hosted the first **NAGPRA Summit at UM** – free and open to the public with Zoom options
  - Courtney Little Axe presented on Indigenizing Collections Care
  - Courtney Little Axe presented on New NAGPRA Regulations
  - Courtney Little Axe presented on History of NAGPRA at UM
  - Representatives from organizations around Montana and beyond in attendance
- *Summer 2024:* Helped host a **Blackfeet Nation** Kids Camp Programs
- *April 2024:* Planned, coordinated, and hosted **Heritage Collections Board** meeting
  - Courtney Little Axe presented on UM’s NAGPRA Policies, Procedures, and Progress
  - Museum of the Rockies staff joined the meeting virtually
- *April 2023:* Two-day meeting of UM's **Heritage Collections Board**, composed of the following Tribal Historic Preservation Officers (THPOs) and Culture Committee Directors. This meeting culminated in a collective agreement and letter re: repatriation plans for unidentified ancestors, which was a historic moment for everyone involved.

## 3. Educational Outreach and Mentoring

- *February 2026* – Courtney Little Axe presented on NAGPRA and related work to **Native American Studies class** at UM
- *January 2026* – **Emma’s Dress** pop-up showcase (boarding schools, repatriation) at UM’s N7 basketball games
- *January 2026* – UM team visited with **Missoula County Public Schools** middle school students to share experiences about how archaeology is changing and to discuss repatriation
- *September-December 2025* – UM student team participated in a **Practicum** to learn about NAGPRA and meet with regional THPOs
- *October 2025* - Courtney Little Axe and team traveled to **ATALM conference** in Cherokee, North Carolina where Ms. Little Axe gave a presentation on UM’s efforts and implications for state, regional, national, and international repatriation issues
- *September 2025* – UM Team traveled to **Fort Peck** Reservation to participate in the Fort Peck Cultural Fair
- *July 2025*: Courtney Little Axe presented on Indigenizing Collections Care at the University of Montana at the **Confluence Events Center, for Historical Research Associates, in Missoula, Montana**
- *July 2025*: Courtney Little Axe presented on Indigenizing collections in Montana and NAGPRA at the **Peabody Essex Museum in Salem, Massachusetts**
- *July 2025*: Courtney Little Axe presented on Emma’s Dress: Stewardship and Collections Care for Descendants, **Kids Kollege Cultural Summer Learning, Chief Dull Knife College, Lame Deer, Montana**
- *July 2025*: Kids College Youth Camp, Chief Dull Knife College Indigenizing collections at the University of Montana and Plant Medicines **Kids Kollege Cultural Summer Learning, Chief Dull Knife College, Lame Deer, Montana**
- *July 2025*: Courtney Little Axe presented on stewardship, repatriation, and Emma’s Dress at **Lame Deer High School** for the **Lodge Approach Conference**

- *June 2025:* UM Team presented at a **Career Fair and Educational Summit** as part of the Summer Native Basketball Invitational
- *April 2025:* UM Team presented at event for future university students (Payne Family Native American Center)
- *February 2025:* Emma's Dress showcase at UM's N7 basketball games
- *November 2024:* Courtney Little Axe presented on Our Role as Repatriation Coordinators at the **Association of Tribal Archives, Libraries, and Museum Conference**
- *October 2024:* Courtney Little Axe presented on Transcending NAGPRA at UM to the **Montana Art Gallery Directors Association Conference**
- *September 2024:* UM Team Traveled to Wolf Point and Poplar to participate in the **Fort Peck Cultural Fair**
- *May 2024:* Transcending NAGPRA at UM to **Academic Officers**
- *April 2024:* Courtney Little Axe presented on New NAGPRA Regulations in **UM's Tribal Sovereignty Class**
- *February 2024:* Courtney Little Axe presented on Transcending NAGPRA at UM to **Artifact and Collection Analysis Class**
- *February 2024:* Courtney Little Axe presented on Transcending NAGPRA at UM to **Historical Archaeology Class**
- *February 2024:* **Emma's Dress** showcase at UM's N7 basketball games
- *December 2023:* Courtney Little Axe presented on Transcending NAGPRA at UM to **Staff Ambassadors**
- *November 2023:* Presented an overview of NAGPRA and the work ahead to **UM Campus Community**
- *November 2023:* Courtney Little Axe presented on NAGPRA Overview and NAGPRA at UM to **Art and Cultural Property Law Class**
- *October 2023:* Presented on UM's NAGPRA work at the **Association of Tribal Libraries and Museums Conference**
- *Summer-Fall 2023:* **Mentored ~20 advanced undergraduate student and graduate student interns** assisting with repatriation processes and THPO consultations

- *May 2023:* UM Team Traveled to Helena to meet with the **Montana THPO Alliance**
- *April 2023:* UM Team shared lessons from Emma’s Dress with 4<sup>th</sup> graders from St. Ignatius, Montana (Char Kosta news article summarizing the event here: [https://www.charkoosta.com/news/champions-of-montana/article\\_47da7040-da1d-11ed-a0d8-abf7876caeb3.html](https://www.charkoosta.com/news/champions-of-montana/article_47da7040-da1d-11ed-a0d8-abf7876caeb3.html))
- *April 2023:* Helped with **CBS news** crew (*CBS Saturday Morning*) first day on the job (<https://www.youtube.com/watch?v=bjRq97OpDwY>)

### **III. NAGPRA at UM -- Team Overview**

Courtney Little Axe, UM NAGPRA-Repatriation Coordinator and Collections Manager, directs a stewardship and repatriation team of PhD, MA, and undergraduate students. The current plan is to expand our small team to hire more students who will be working as PhD and MA RAs and undergraduate interns to serve as collections stewardship assistants and liaisons for Ms. Little Axe and Montana THPOs who are part of the UM Heritage Collections Board and Montana THPO Alliance. UM Anthropology Professor Kelly Dixon assists Ms. Little Axe and the team whenever possible and advises graduate students on thesis and dissertation projects relevant to the work described here. *See accompanying document with summary of UM student team to date.*

### **IV. Background on NAGPRA Writ Large and the Recent 2024 Regulations**

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal human rights law enacted in 1990, designed to protect Indigenous graves and to mandate that America’s universities and museums audit their Indigenous North American (US) and Native Hawaiian collections and return, or repatriate, cultural belongings to lineal descendants and/or to the appointed representatives of Indigenous nations. The law is also designed to protect newly discovered graves (*Code of Federal Regulations*. Title 43, Part 10).

NAGPRA is an expression of Indigenous rights to sovereignty that acknowledges the inherent authority Indigenous nations have over their ancestors and their belongings. However, the original NAGPRA regulations did not define significant processes for implementing the law, such as what is meant by ‘consultation.’ To remedy this, lots of work went into the new 2024 NAGPRA regulations, ensuring that Native American and Native Hawaiian value systems would accompany the law and that the steps toward repatriation include meaningful consultation.

Therefore, the new NAGPRA regulations are meant “to clarify and improve upon the systematic processes for disposition or repatriation of Native American human remains and cultural items,” and to more explicitly incorporate “Native American traditional knowledge” into the act’s implementation (United States Code, Title 25, Section 32). This reflects the unique relationships that exist within/between Native American nations, Native Hawaiians, and the US (88 Fed. Reg. 86,452 (Dec. 13, 2023) and provides a value structure to constructively carry forward the multiple steps in the accompanying legal process.

**Tables 1 and 2 (below) outline the steps required to carry out the 2024 NAGPRA regulations.**

Additionally, the new regulations include a requirement for museums to “obtain free, prior, and informed consent from lineal descendants, Indian Tribes, or Native Hawaiian organizations prior to allowing any exhibition of, access to, or research on human remains or cultural items” (*Duty of Care*. Code of Federal Regulations, Title 43, Part 10.1d3).

For more information about NAGPRA, review the links and information here: [Native American Graves Protection and Repatriation Act \(U.S. National Park Service\)](#)

For a general list of NAGPRA resources, review the links and information here: [Links and Important Resources | University of Montana](#)

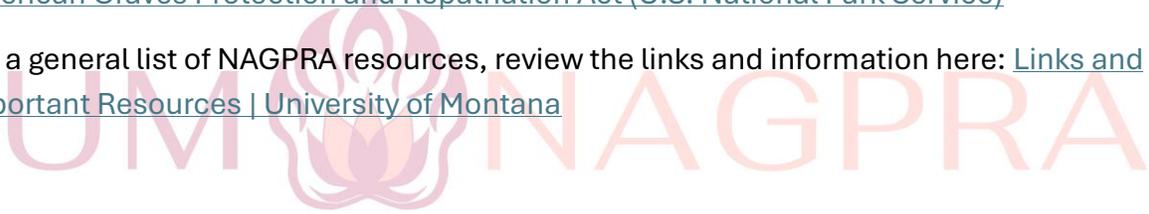


Table 1. National NAGPRA steps to repatriation – Steps 1-4.

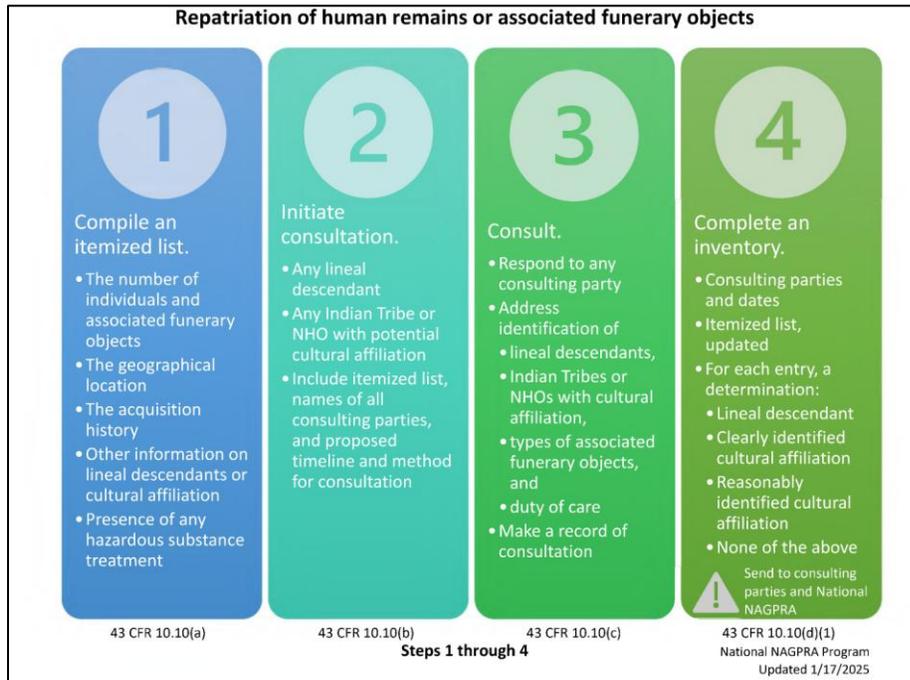


Table 2. National NAGPRA steps to repatriation – Steps 5-8.

