

# FIELD MUSEUM

## REPATRIATION POLICY

Excerpted from the  
FIELD MUSEUM OF NATURAL HISTORY  
COLLECTIONS MANAGEMENT POLICY

The current version of the Field Museum of Natural History’s (“Museum”) Collections Management Policy (“CMP,” “Policy”) was approved by the Board of Trustees (“Trustees”) on June 11, 2024, with additional revisions to the Repatriation Section approved on September 24, 2024, and is to be interpreted in accordance with the Museum’s purpose, mission, and Code of Ethics.

#### 4. Repatriations

##### a. Introduction

- i. **Purpose:** The purpose of the Repatriation Policy is to set out principles and policies to facilitate and expedite the respectful repatriation of Human Remains and Collection Items from the Field Museum to Lineal Descendants, Cultural Groups, and other Appropriate Requestors.
- ii. **Authority:** Under Illinois law, the Museum’s Board of Trustees (“Board”) has a fiduciary obligation to protect and preserve the Museum’s collections. While Museum staff carry out the day-to-day operations of the Museum, the Board is responsible for establishing policies and overseeing the governance of the Museum’s collections. The Board has delegated authority to Museum staff, primarily through the Center for Repatriation, Tribal Relations, and Provenance Research (“the Center”), with the oversight of the Collections Committee of the Board, to make decisions, consistent with this Policy and relevant laws, regarding repatriations under the Native American Graves

Protection and Repatriation Act (NAGPRA), as well as repatriations and repatriation-related transfers that fall outside of NAGPRA. All other transfers and deaccessions of Collection Items are overseen by the Board as detailed elsewhere in the Collections Management Policy.

**b. Applicability**

The Repatriation Policy is intended to promote consistency and is applicable to the Museum as a whole, including all departments and collections areas of the Museum.

**c. Principles**

- i. Importance of repatriation:** The Field Museum acknowledges respectful and expeditious Repatriation of Human Remains and certain Collection Items as a fundamental and necessary step to respecting and promoting the inherent rights of all peoples and to establishing and/or fostering relationships with communities around the world, especially Indigenous Peoples.
- ii. Consultation:** The Field Museum is committed to meaningful and mutually respectful Consultation with Lineal Descendants, Cultural Groups, and other Appropriate Requestors. On the part of the Museum, respectful Consultation includes acknowledgement and respect for sovereignty and cultural and religious practices and knowledge, as well as the development and maintenance of mutual trust through transparent communication that is also respectful of Confidential Information.
- iii. Accessibility:** The Museum is committed to providing reasonable access to Human Remains, Collection Items, and associated documentation to Authorized Representatives through fair, transparent, and effective mechanisms subject to the requirements of NAGPRA and the Museum's access procedures.
- iv. Compliance:** Because it receives federal funding, the Museum is subject to the Native American Graves Protection and Repatriation Act, 25 U.S.C. 3001, *et seq.*, and associated regulations promulgated by the Department of the Interior (NAGPRA). The Museum shall comply with NAGPRA and any other applicable laws on repatriation. All repatriation requests by Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations recognized by NAGPRA with respect to Human Remains, Associated and Unassociated

Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony shall be made in accordance with the requirements of NAGPRA and in keeping with the spirit of that law.

- v. **Requests for Repatriations or returns that fall outside of NAGPRA** (for instance, requests by international requestors or for items that are not NAGPRA-eligible) shall be considered on a case-by-case basis. Such decisions shall be consistent with this Policy and with the Museum’s other legal, fiduciary, and ethical obligations.
- vi. **Prioritization of returns to communities over nation-states:** The Museum holds individual and community rights to Human Remains and certain Collection Items paramount to those of nation-states, but also recognizes that, in some cases, nation-states may be the appropriate stewards of Human Remains and Collection Items.
- vii. **Care and treatment:** The Field Museum is committed to ethical and respectful care and culturally appropriate treatment of Human Remains and Collection Items stewarded by the Museum. The Museum recognizes that culturally appropriate treatment must derive from Consultation with Lineal Descendants and Cultural Groups subject to the Museum’s care procedures.

d. **NAGPRA**

i. **Statement on Language**

The Field Museum acknowledges that the use of certain language within this policy and the accompanying procedures may be considered offensive or non-inclusive. As a steward of Human Remains and Cultural Items, the Museum recognizes that some terms are not all-inclusive or appropriate in all cases.

While some of these terms may still be utilized, they will be applied broadly and alternative terms may be substituted on a case-by-case basis. For the purposes of legal clarity and consistency with NAGPRA, this policy uses terms such as “Associated and Unassociated Funerary Objects,” “Human Remains,” and “Objects of Cultural Patrimony.” Out of respect to communities and their ancestors, Human Remains will always be referred to separately while other NAGPRA categories may be commonly referred to as “Cultural Items.”

**Definitions:** A majority of the following definitions are taken directly from

NAGPRA (43 C.F.R. §10.2) and are included here for ease of reference.

“Authorized Representative” means an individual officially designated by a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization as responsible for matters relating to repatriation under NAGPRA.

“Confidential Information” is any information shared by a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization during the Consultation process regarding Native American Traditional Knowledge and places that have traditional cultural significance, including the locations of sacred sites, graves, and cemeteries, and specific information shared by a consulting entity, including the Museum, that is identified as confidential by a Consulting Party.

“Consultation” or “Consult” means the exchange of information, open discussion, and joint deliberations made between all parties in good faith and in order to seek, discuss, and consider the views of all parties; strive for consensus, agreement, or mutually acceptable alternatives; and enable meaningful consideration of the Native American Traditional Knowledge of Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations.

“Consulting Party” means any Lineal Descendant and any Indian Tribe or Native Hawaiian Organization with potential cultural affiliation, as well as the Museum.

“Cultural Affiliation” means there is a reasonable connection between Human Remains or Cultural Items and an Indian Tribe or Native Hawaiian Organization based on a relationship of shared group identity. Cultural Affiliation may be identified clearly by the information available or reasonably by the geographical location or acquisition history of the Human Remains or Cultural Items.

“Cultural Item” means a Funerary Object, Sacred Object, or Object of Cultural Patrimony according to the Native American Traditional Knowledge of a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization.

“Custody” means having an obligation to care for the object or item but not a sufficient interest in the object or item to constitute Possession or Control. In general, Custody through a loan, lease, license, bailment, or other similar arrangement is not a sufficient interest to constitute Possession or Control, which resides with the loaning, leasing, licensing, bailing, or otherwise

transferring museum or Federal agency.

“Funerary Object” means any object reasonably believed to have been placed intentionally with or near Human Remains. A Funerary Object is any object connected, either at the time of death or later, to a death rite or ceremony of a Native American culture according to the Native American Traditional Knowledge of a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization. This term does not include any object returned or distributed to living persons according to traditional custom after a death rite or ceremony. Funerary Objects are either Associated Funerary Objects or Unassociated Funerary Objects.

“Associated Funerary Object” means any Funerary Object related to Human Remains that were removed and the location of the Human Remains is known. Any object made exclusively for burial purposes or to contain Human Remains is always an Associated Funerary Object regardless of the physical location or existence of any related Human Remains.

“Unassociated Funerary Object” means any Funerary Object that is not an Associated Funerary Object and is identified by a preponderance of the evidence as one or more of the following:

1. related to Human Remains but the Human Remains were not removed, or the location of the Human Remains is unknown;
2. related to specific individuals or families;
3. removed from a specific burial site of an individual or individuals with Cultural Affiliation to an Indian Tribe or Native Hawaiian Organization; or
4. removed from a specific area where a burial site of an individual or individuals with Cultural Affiliation to an Indian Tribe or Native Hawaiian Organization is known to have existed, but the burial site is no longer extant.

“Human Remains” means any physical part of the body of a Native American individual. This term does not include Human Remains to which a museum or Federal agency can prove it has a right of possession. Human Remains reasonably believed to be comingled with other materials (such as soil or faunal remains) may be treated as Human Remains. Human Remains incorporated into a Funerary Object, Sacred Object, or Object of Cultural Patrimony are considered part of the Cultural Items rather than Human Remains. Human Remains incorporated into an object or item that is not a

Funerary Object, Sacred Object, or Object of Cultural Patrimony are considered Human Remains.

“Indian Tribe” means any Tribe, band, nation, or other organized group or community of Indians, including any Alaska Native village (as defined in, or established pursuant to, the Alaska Native Claims Settlement Act (43 U.S.C. 1601 et seq.)), recognized as eligible for the special programs and services provided by the United States Government to Indians because of their status as Indians by its inclusion on the list of recognized Indian Tribes published by the Secretary under the act of November 2, 1994 (25 U.S.C. 5131).

“Lineal Descendant” means a living person tracing ancestry, either by means of traditional Native American kinship systems, or by the common-law system of descent, to a known individual whose Human Remains, Funerary Objects, or Sacred Objects are subject to NAGPRA; or a living person tracing ancestry, either by means of traditional Native American kinship systems, or by the common-law system of descent, to all the known individuals represented by commingled Human Remains.

“Native American Traditional Knowledge” means knowledge, philosophies, beliefs, traditions, skills, and practices that are developed, embedded, and often safeguarded by or confidential to individual Native Americans, Indian Tribes, or the Native Hawaiian Community. Native American Traditional Knowledge contextualizes relationships between and among people, the places they inhabit, and the broader world around them, covering a wide variety of information, including, but not limited to, cultural, ecological, linguistic, religious, scientific, societal, spiritual, and technical knowledge. Native American Traditional Knowledge may be, but is not required to be, developed, sustained, and passed through time, often forming part of a cultural or spiritual identity. Native American Traditional Knowledge is expert opinion.

“Native Hawaiian Organization” means any organization that: serves and represents the interests of Native Hawaiians, who are descendants of the Indigenous people who, before 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawai’i; has as a primary and stated purpose the provision of services to Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has expertise in Native Hawaiian affairs, and includes, but is not limited to: The Office of Hawaiian Affairs established by the constitution of the State of

Hawai'i; Native Hawaiian organizations (including 'ohana) who are registered with the Secretary of the Interior's Office of Native Hawaiian Relations; and Hawaiian Homes Commission Act (HHCA) Beneficiary Associations and Homestead Associations as defined under 43 CFR 47.10.

“Object of Cultural Patrimony” means an object that has ongoing historical, traditional, or cultural importance central to a Native American group, including any constituent sub-group (such as a band, clan, lineage, ceremonial society, or other subdivision), according to the Native American Traditional Knowledge of an Indian Tribe or Native Hawaiian Organization. An Object of Cultural Patrimony may have been entrusted to a caretaker, along with the authority to confer that responsibility to another caretaker. The object must be reasonably identified as being of such importance central to the group that it cannot or could not be alienated, appropriated, or conveyed by any person, including its caretaker, regardless of whether the person is a member of the group, and must have been considered inalienable by the group at the time the object was separated from the group.

“Possession” or “Control” means having a sufficient interest in an object or item to independently direct, manage, oversee, or restrict the use of the object or item. A museum or Federal agency may have possession or control regardless of the physical location of the object or item. In general, custody through a loan, lease, license, bailment, or other similar arrangement is not a sufficient interest to constitute possession or control, which resides with the loaning, leasing, licensing, bailing, or otherwise transferring museum or Federal agency.

“Repatriation” means a museum or Federal agency relinquishes Possession or Control of Human Remains or Cultural Items in a holding or collection to a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization.

“Sacred Object” means a specific ceremonial object needed by a traditional religious leader for present-day adherents to practice traditional Native American religion, according to the Native American Traditional Knowledge of a Lineal Descendant, Indian Tribe, or Native Hawaiian Organization. While many items might be imbued with sacredness in a culture, this term is specifically limited to an object needed for the observance or renewal of a Native American religious ceremony.

## ii. Implementation

- a. Request types and typical review process:* All of the following NAGPRA-related request types shall be directed to the NAGPRA Director (see Section (e) below regarding non-NAGPRA requests). For each request, the NAGPRA Director or their designee shall complete a reasonable assessment of the facts pursuant to NAGPRA.

**NAGPRA requests for Human Remains and Associated Funerary Objects** are Repatriation requests from Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations, for Human Remains and Associated Funerary Objects pursuant to NAGPRA. Such a request for which a Notice of Inventory Completion has been published in the Federal Register shall be deemed approved if no competing requests are received. Once a Notice of Inventory Completion has been published, the Museum has an affirmative obligation to Repatriate the Human Remains and/or Associated Funerary Objects to the requesting Lineal Descendant, Indian Tribe, or Native Hawaiian Organization identified in the Notice absent competing requests. A reasonable assessment of the facts will have occurred prior to the publication of the Notice, which shall be approved by the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. No further assessment or approval is required, but notification of the Repatriation shall be provided to the Collections Committee at its next meeting.

**NAGPRA requests for Cultural Items** are Repatriation requests from Lineal Descendants, Indian Tribes, and Native Hawaiian Organizations for Unassociated Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony, pursuant to NAGPRA. Such requests shall generally be decided on a case-by-case basis, upon the review and recommendation of the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. Notification of the Repatriation shall be provided to the Collections Committee at its next meeting.

**Repatriation-related outgoing transfer requests** are requests from Lineal Descendants, Indian Tribes, Native Hawaiian Organizations, other museums or institutions, or Federal agencies for the transfer of Possession or Control and/or Custody of Human Remains and/or Cultural Items from the Field Museum to another entity for the purpose of Repatriation.



Transfer requests submitted by Indian Tribes and Native Hawaiian Organizations for Human Remains and/or Associated Funerary Objects with no Lineal Descendants and no Indian Tribes or Native Hawaiian Organizations with Cultural Affiliation for which a Notice of Proposed Transfer or Reinterment has been published in the Federal Register shall be deemed approved if no repatriation requests are received. A reasonable assessment of the facts will have occurred prior to the publication of the Notice, which shall be approved by the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. No further assessment or approval is required, but notification of the transfer must be provided to the Collections Committee at its next meeting.

All other repatriation-related outgoing transfer requests shall be decided on a case-by-case basis, upon the review and recommendation of the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President.

**Repatriation-related incoming transfer requests** are requests from Lineal Descendants, Indian Tribes, Native Hawaiian Organizations, other museums or institutions, or Federal agencies for temporary transfer of custody of Human Remains and/or Cultural Items to the Field Museum from another entity for the purpose of Repatriation. Such requests shall be decided on a case-by-case basis by the NAGPRA Director and Area Curator(s) and Collection Manager(s).

- b. Additional Review:* Select NAGPRA Repatriation requests may require additional review, as determined by the President, due to factors including, but not limited to, the size of the request or especially sensitive ethical or political concerns. Such requests shall be decided by the Collections Committee, upon the review and recommendation of the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. In extraordinary circumstances, the matter may be elevated to the full Board of Trustees if the President and Chair of the Collections Committee deem it necessary.
- c. Denied NAGPRA Requests:* Should the Museum decide for any reason (e.g., lack of category fit, lack of cultural affiliation, etc.) to deny a request for repatriation under NAGPRA, the request shall be reviewed

by the Collections Committee, and the Collections Committee shall decide whether such decision was made in error and whether the repatriation should proceed. The Collections Committee's decision will be based on the information and recommendations provided by the NAGPRA Director, Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President. The Collections Committee may request additional information from Museum staff or consult with outside experts.

***d. Additional Responsibilities:***

The Center holds primary responsibility for facilitation of the Repatriation process, in addition to repatriation-related Consultation and transfers. The Center and other Museum staff involved in Repatriation matters are responsible for the fair and objective consideration, assessment, and determination of these requests.

The Collections Committee is responsible for oversight of the Museum's repatriation activities.

General Counsel shall provide legal advice as needed.

The President may participate in Consultation as appropriate.

The President or their designee is responsible for reviewing and responding to complaints and appeals based on procedural violations of the Repatriation Policy; this does not include disagreements about a decision or the outcome of a process, provided the requirements of this Policy have been substantially met.

Government Affairs staff may participate in Consultation and other repatriation activities as appropriate.

The Tribal Liaison may participate in Consultation and informal mediation as appropriate.

All of the Museum's Center Directors are responsible for ensuring that all Human Remains and potential Cultural Items in the collections for which they are responsible are reported to the Center for Repatriation, Tribal Relations, and Provenance Research. Center Directors and Section Heads, or their delegates, must work in cooperation with the Center for Repatriation, Tribal Relations, and Provenance Research and Area

Collection Manager(s) to determine and complete the appropriate action needed with respect to these Human Remains and potential Cultural Items pursuant to the Repatriation Policy and Procedures.

*e. Procedures:* The Museum must maintain and document internal procedures for NAGPRA requests, which shall adhere to the principles and policies set forth in this document. These procedures must address the following steps at a minimum:

1. Consultation
2. Assessment and Determinations
3. Physical Return
4. Stewardship Agreements
5. Conflict Resolution
6. Repatriation-Related Transfers
7. Implementation Plan

**e. Non-NAGPRA**

**i. Statement on Language**

The Field Museum acknowledges that the use of certain language within this policy and the accompanying procedures may be considered offensive or non-inclusive. As a steward of human remains and items from global contexts, the Museum recognizes that some terms are not all-inclusive or appropriate in all cases. While some of these terms may still be utilized, they will be applied broadly and alternative terms may be substituted on a case-by-case basis. For purposes of institutional clarity and consistency, the policy uses the term “Collection Items.” This term reflects the current status of cultural and natural resources that are held in the Field Museum’s collections, or are otherwise under the Field Museum’s control, and is not intended to diminish the significance of these items or the relationship between these items and Lineal Descendants, Cultural Groups, or other Appropriate Requestors.

**Definitions**

“Appropriate Requestor” means any individual or entity with a reasonable status to make a request under this Policy. Appropriate Requestors may include, but are not limited to, governments, arms of governments, or entities

acting on behalf of source communities.

“Authorized Representative” means an individual officially designated by a Lineal Descendant, Cultural Group, or other Appropriate Requestor as responsible for matters relating to repatriation under the Repatriation Policy.

“Collection Items” means cultural and natural resources currently held in the Field Museum’s collections, or otherwise under the Field Museum’s control, that have cultural, historical, or religious importance to a descendant community or other Appropriate Requestor, and/or problematic collection or acquisition histories. Whether Collection Materials are eligible for return will be assessed under the criteria provided in Section 4.e.ii.c.

“Confidential Information” is any information shared by a Lineal Descendant, Cultural Group, or other Appropriate Requestor during the Consultation process regarding Traditional or Community Knowledge and places that have traditional cultural significance, including the locations of sacred sites, graves, and cemeteries, and specific information shared by a consulting entity, including the Museum, that is identified as confidential by a Consulting Party.

“Consultation” or “Consult” means the exchange of information, open discussion, and joint deliberations made between all parties in good faith and in order to seek, discuss, and consider the views of all parties; strive for consensus, agreement, or mutually acceptable alternatives; and enable meaningful consideration of the Traditional or Community Knowledge of Lineal Descendants, Cultural Groups, and other Appropriate Requestors.

“Consulting Party” means any Lineal Descendant and any Cultural Group or Appropriate Requestor with potential cultural affiliation or another reasonable connection.

“Cultural Affiliation” means there is a reasonable connection between Human Remains or Collection Items and a Cultural Group based on a relationship of shared group identity.

“Cultural Group” means a coherent population of individuals that share a common culture, such as a First Nation, tribe, or clan.

“Funerary Object” means any object reasonably believed to have been placed intentionally with or near Human Remains or created for the purpose of a

funerary practice or rite.

“Human Remains” means any physical part of the body of an individual. This term does not include human remains that were or may reasonably be determined to have been freely given or naturally shed from the individual from whose body the material was obtained.

“Lineal Descendant” means a living person tracing their ancestry, either by means of their community’s traditional kinship systems, or other relevant system of descent, to a known individual whose Human Remains or Collection Items are subject to the Repatriation Policy.

“Repatriation” means the act or process of returning Human Remains or Collection Items to Lineal Descendants, Cultural Groups, or other Appropriate Requestors.

“Traditional” or “Community Knowledge” means knowledge, philosophies, beliefs, traditions, skills, and practices that are developed, embedded, and often safeguarded by or confidential to Indigenous Peoples or other cultural group or community. Traditional or Community Knowledge contextualizes relationships between and among people, the places they inhabit, and the broader world around them, covering a wide variety of information, including, but not limited to, cultural, ecological, linguistic, religious, scientific, societal, spiritual, and technical knowledge. Traditional or Community Knowledge may be, but is not required to be, developed, sustained, and passed through time, often forming part of a cultural or spiritual identity.

## ii. Implementation

- a. ***Request types and typical review process:*** All of the following request types shall be directed to the Center, care of the CCR Vice President’s Office for assignment to either the NAGPRA Director or Provenance Research Director. For each request, the Center’s staff shall complete a reasonable assessment of the facts relevant to the request.

**Non-NAGPRA requests for Human Remains and Associated Funerary Objects** are Repatriation requests from Lineal Descendants, Cultural Groups, and other Appropriate Requestors for Human Remains and/or Associated Funerary Objects that are made not pursuant to NAGPRA. Such requests shall generally be decided by the Collections

Committee on a case-by-case basis, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President.

**Non-NAGPRA requests for Collection Items that are not Associated Funerary Objects** are Repatriation requests from Lineal Descendants, Cultural Groups, and other Appropriate Requestors for Collection Items that are made not pursuant to NAGPRA. Such requests shall generally be decided by the Trustees on a case-by-case basis, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Directors of GFCC and NIRC, Office of General Counsel, Vice President, and President.

**Repatriation-related outgoing transfer requests** are requests from Lineal Descendants, Cultural Groups, other museums or institutions, or Federal agencies for the transfer of Possession or Control and/or Custody of Human Remains and/or Collection Items from the Field Museum to another entity for the purpose of Repatriation. Such requests shall generally be decided by the Collections Committee on a case-by-case basis, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President, and President.

**Repatriation-related incoming transfer requests** are requests from Lineal Descendants, Cultural Groups, other museums or institutions, or Federal agencies for temporary transfer of Human Remains and/or Collection Items to the Field Museum from another entity for the purpose of Repatriation. Such requests shall be decided on a case-by-case basis by the appropriate Center director (as assigned by the VP), Area Curator(s), and Collection Manager(s).

- b. Additional Review:* Select non-NAGPRA Repatriation requests that are normally decided by the Collections Committee may require additional review, as determined by the President or Chair of the Collections Committee, due to factors including, but not limited to, the size of the request or especially sensitive ethical or political concerns. Such requests shall be decided by the Board, upon the review and recommendation of the appropriate Center director (as assigned by the VP), Area Curator(s) and Collection Manager(s), Office of General Counsel, Vice President,

President, and Collections Committee.

*c. Assessment of non-NAGPRA requests* shall require consideration of the following criteria:

1. Standing of the Lineal Descendant, Cultural Group, or other Appropriate Requestor to make a request pursuant to the Policy;
2. Request made by an Authorized Representative of the Lineal Descendant, Cultural Group, or other Appropriate Requestor;
3. Cultural Affiliation or other reasonable connection established between the requestor and the requested individuals or items;
4. Degree of cultural, historical, or religious significance;
5. Collection and acquisition history including how the individuals or items were separated from the individual or community to whom they belonged;
6. Likelihood of competing requests; and
7. Other considerations as appropriate.

*d. Additional Responsibilities:*

The Center holds primary responsibility for facilitation of the Repatriation process, in addition to repatriation-related Consultation and transfers.

The Center and other Museum staff involved in Repatriation matters are responsible for the fair and objective consideration, assessment, and determination of these requests.

The Collections Committee is responsible for the oversight of the Museum's Repatriation activities.

General Counsel shall provide legal advice as needed.

The President may participate in Consultation as appropriate.

The President or their designee is responsible for reviewing and responding to complaints and appeals based on procedural violations of the Repatriation Policy; this does not include disagreements about a decision or the outcome of a process, provided the requirements of this Policy have been substantially met.

Government Affairs staff may participate in Consultation and other repatriation activities as appropriate.

The Tribal Liaison may participate in Consultation and informal mediation as appropriate.

All of the Museum's Center Directors are responsible for ensuring that all Human Remains in the collections for which they are responsible are reported to the Center for Repatriation, Tribal Relations, and Provenance Research. Center Directors and Section Heads, or their delegates, must work in cooperation with the Center for Repatriation, Tribal Relations, and Provenance Research and Area Collection Manager(s) to determine and complete the appropriate action needed with respect to these Human Remains pursuant to the Repatriation Policy and Procedures.

**b. *Procedures:*** The Museum must maintain internal procedures for non-NAGPRA requests, which shall adhere to the principles and policies set forth in this document. These procedures must address the following steps at a minimum:

1. Consultation
2. Assessment and Determinations
3. Physical Return
4. Stewardship Agreement
5. Conflict Resolution
6. Repatriation-Related Transfers
7. Implementation Plan

**f. Revisions**

Revisions to the Repatriation Policy and Procedures will be completed in compliance with the Museum's Collections Management Policy.