Bernstein & Associates
NAGPRA Consultants

NAGPRA Data Management Guide

Introduction

Bernstein & Associates NAGPRA Consultants developed this NAGPRA Data Management Guide to assist museums, agencies, institutions, and Tribal Nations in establishing consistent, accurate, and legally compliant practices for managing information subject to the Native American Graves Protection and Repatriation Act (NAGPRA), as amended, and its implementing regulations at 43 CFR Part 10. Effective data management is essential to fulfilling the Act's requirements for consultation, inventory and summary preparation, cultural affiliation determinations, notices, repatriation, and disposition. This guide is intended to support transparent, accountable, and culturally respectful stewardship of records relating toNative American human remains, funerary objects, sacred objects, and objects of cultural patrimony. As a working draft, this document reflects current regulatory requirements and emerging best practices designed to promote collaboration with lineal descendants, Indian Tribes, and Native Hawaiian organizations while ensuring that institutional records and processes support timely and appropriate compliance with federal law.

In addition to this guide, Bernstein & Associates NAGPRA Consultants is pleased to make available recordings of previous presentations addressing the development and implementation of NAGPRA data management systems and related compliance practices.

- Establishing a NAGPRA Data Management System for Museums A webinar recorded for the National NAGPRA Program in 2023
- Data Management and Tracking Systems Training A webinar recorded by the NAGPRA Community of Practice in 2021

Table of Contents

File Types.....2

File Locations.....2

File Naming & Organization.....3-4

Inventory Provision.....5

Summary Provision Files.....6

Consultation & Communication.....7

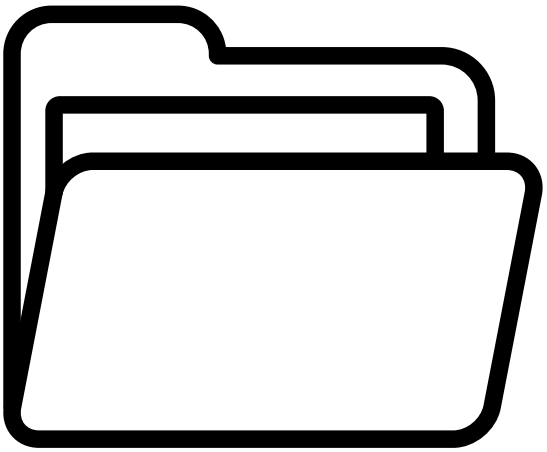
Grants.....8

Tribal Communications & Consultations 9

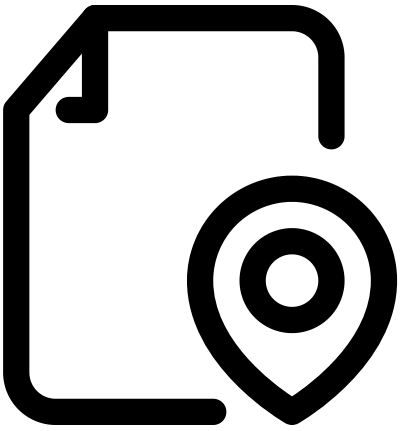
Scanning Protocols.....10

FILE TYPES & LOCATIONS

File Types: Archival & Active



There are two major types of files: archival and working. Archival files contain records of past activities and are no longer actively updated with new materials. An example of an archival file is documentation of a completed repatriation. Because these items have been returned, no additional documents will be added. In contrast, active files are still in use and continue to have documents added to them. An example of active files are correspondence files. As the museum continues to work with Tribes and Native Hawaiian Organizations, correspondence files will continue to grow. Additionally, files may start as active and become archival over time. For example, open grant files are active files but once the grant is complete, those files become archival.



File Locations

Bernstein & Associates NAGPRA Consultants clients will receive access to a Dropbox folder. Your organization should save this on your server at the completion of your project with us. We recommend limiting access to repatriation folders to only the necessary staff as some of these files could have sensitive information.

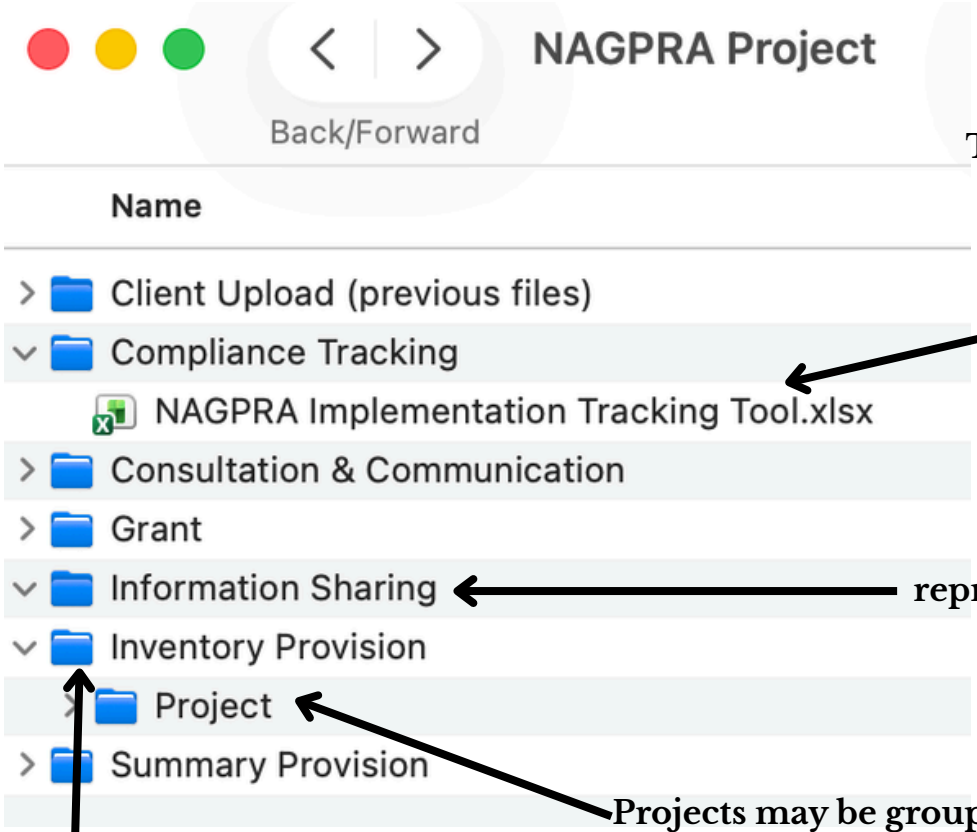
Personalize me!

NAGPRA files for our institution are saved here:

_____

FILE NAMING & ORGANIZATION

It is important to keep file names consistent and brief. We have tried to standardize terms to aid in searching for files. Below are examples of the majority of file name types. Before naming any files, refer to this list and/or other files of a similar type to maintain consistency. This is a general guideline. Sometimes you will need to create folders rather than an individual file for those items with more than one document on that subject. Use the existing files to guide your needs.



This tracking tool is setup at the beginning of every project; it keeps track of legal milestones.

Folder for Tribal representatives to access and review documents

Projects may be grouped by geography (e.g. County or Site Description, ST)

Inventory Provision

The Inventory provision of NAGPRA pertains to human remains & associated funerary objects. If any new remains are located, use the human remains file folders as a guide for how to create new files.

FILE NAMING & ORGANIZATION

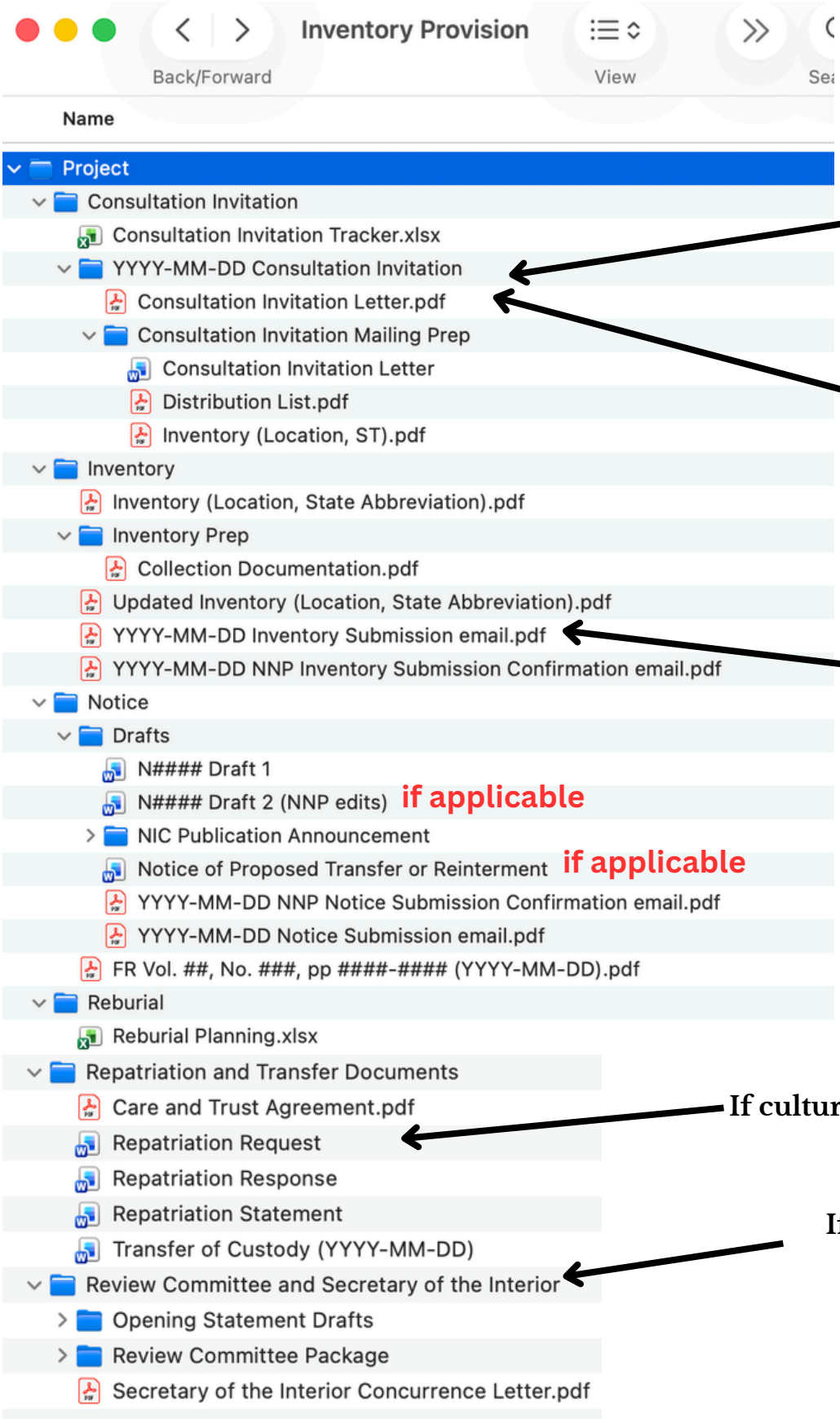
PROJECT GROUPING

Projects are typically grouped by their geographic location (e.g. County or Site Description, ST). However, there may be cases in which a different grouping is called for. Whatever grouping you choose, make sure that it is consistent across your files.



There may also be cases in which you send a Summary Letter that invites consultation. In that case, we recommend creating a folder in the Consultation & Communication folder for that mailing.

Inventory Provision - Project Specific Files



Final list or folder of letters and enclosures sent to Tribal Recipients

See note on page 7 regarding where else consultation invitations may be saved.

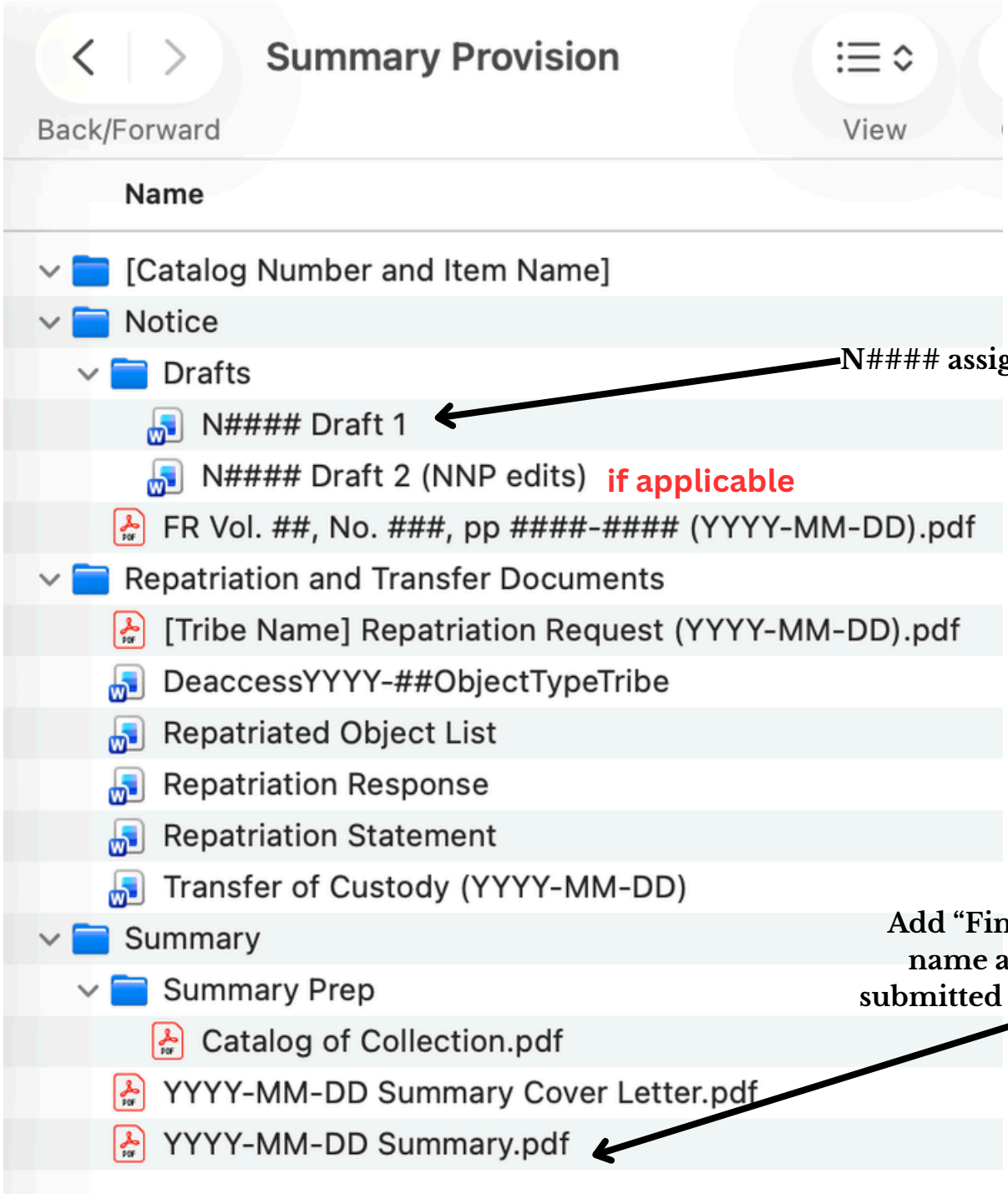
If the Inventory and Notice are submitted together, this email will be a duplicate of the Inventory submission email

If culturally affiliated

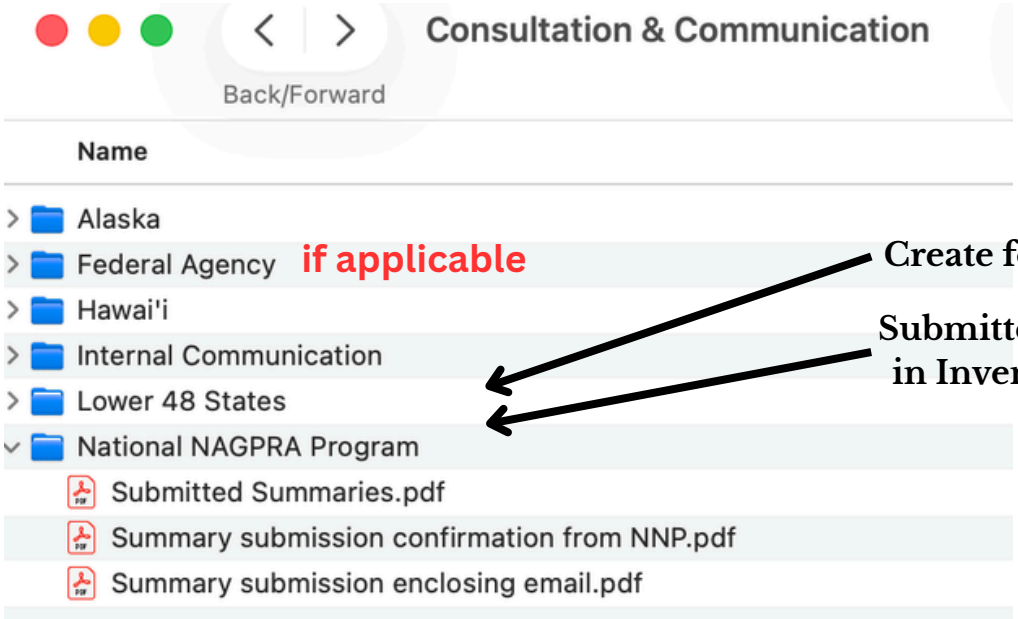
If presenting to NAGPRA Review Committee

Summary Provision Files

Summary Provision (Section 6)
The Summary provision of NAGPRA pertains to unassociated funerary objects, sacred objects, and objects of cultural patrimony.

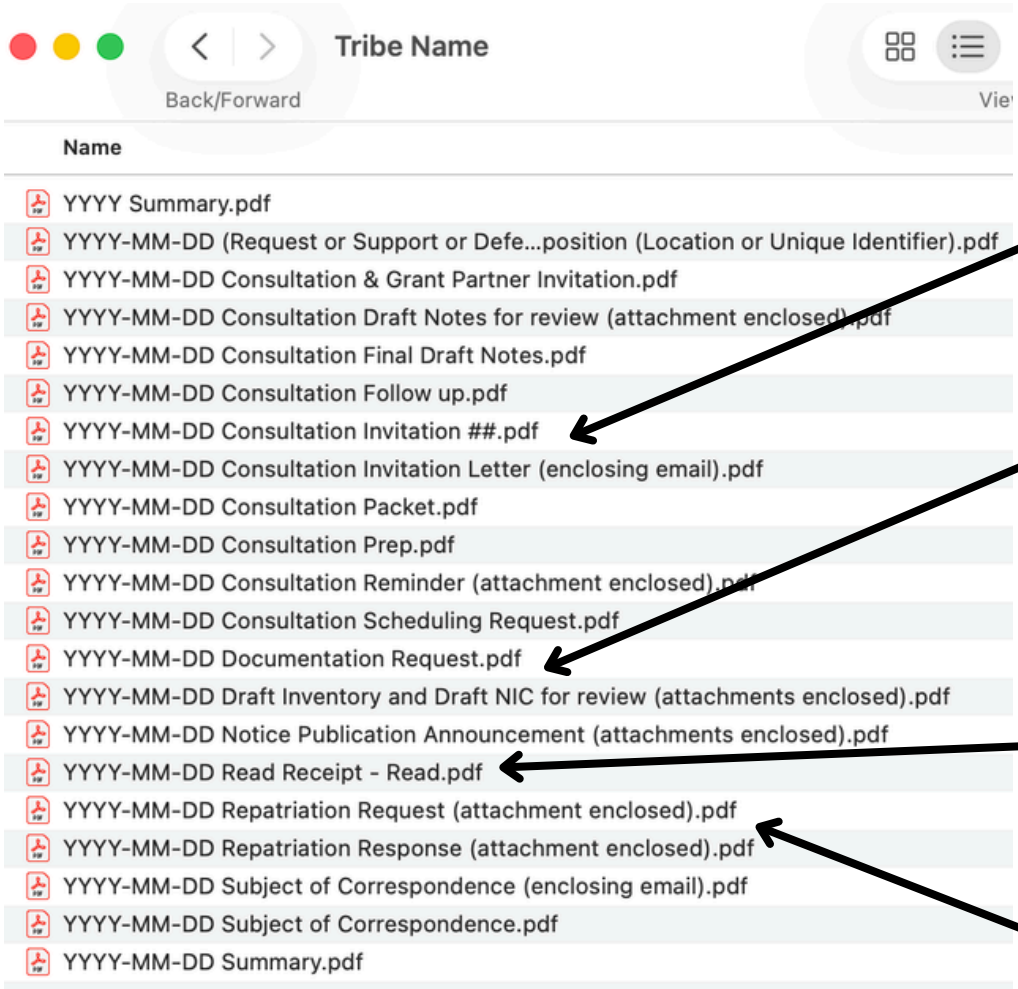


Consultation & Communication



Create folders for all Tribes

Submitted Inventories are filed in Inventory Provision Folder



File bounced-back / undeliverable emails as well as those that were delivered

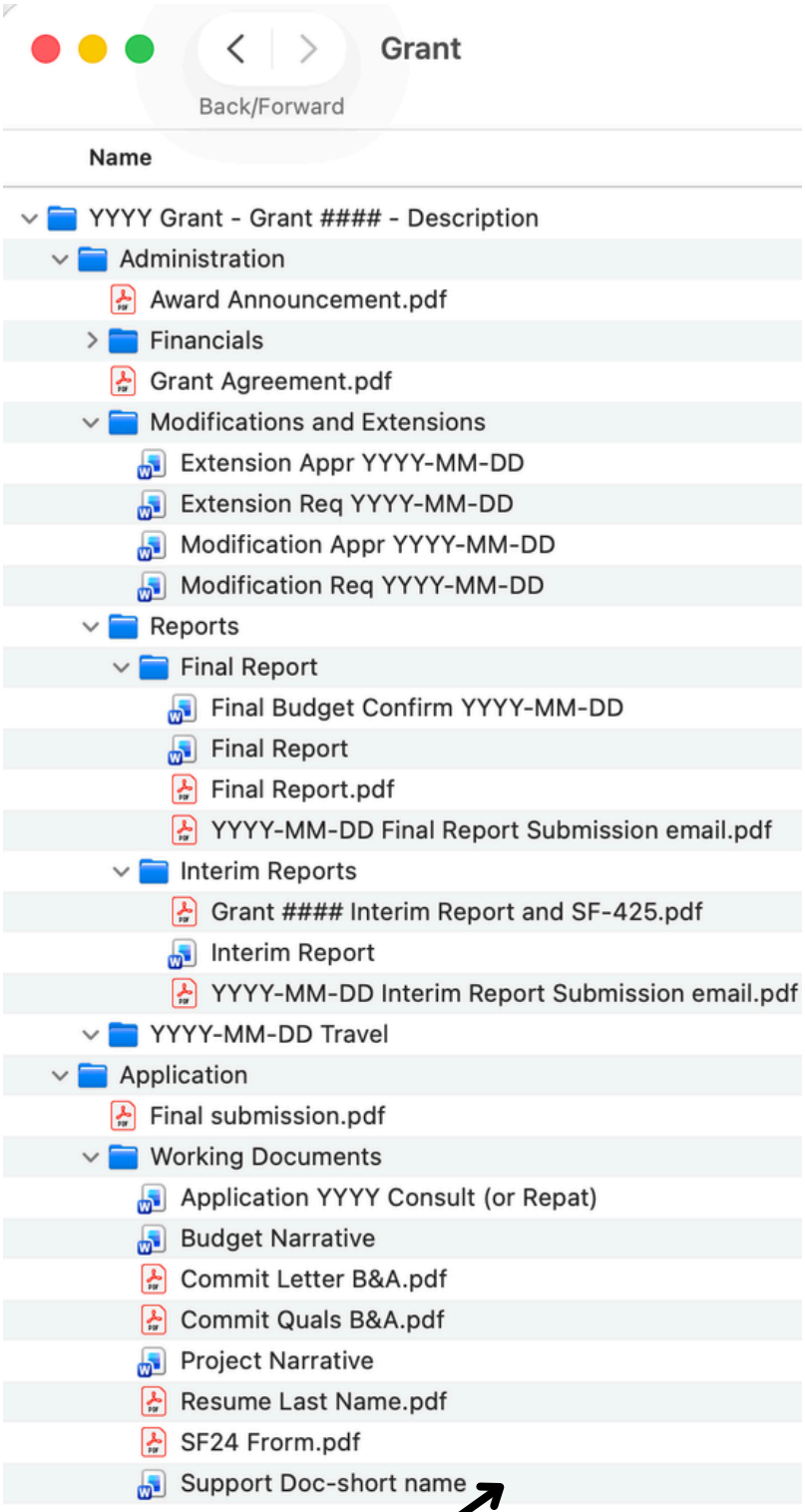
When Tribal Representatives request additional information

You also must file any Read Receipts received, whether the recipient read or didn't read the email

Use this format for other types of correspondence

Please note that some systems require that file names be under 250 characters.

Grants



e.g., XferContrlLetter

Tribal Communication & Consultations

Informal Communication:
When you receive an email or letter, save it in the Tribe's file.

Consultation:
When we have individual consultations with a Tribe, digital meeting minutes are filed in the Consultation folder in that Tribe's folder. However, when there are consortium consultations, the digital meeting minutes are stored in a group folder in the Tribal files. They will remain grouped as we only ever consulted with them as a group. There will be an individual Tribal file for those Tribes within the groups. If you have a new grant that is going to involve group consultations about human remains AND associated funerary objects, meeting minutes are filed in the grant files.

Files to Update: When any consultations occur be sure to update the Tracking Tool.

General Correspondence
If you are sharing official NAGPRA documents (ex: consultation invitation letters, summary letters) please see Official NAGPRA Correspondence below.

If your PDF software has the capability to combine attachments with their enclosing email into one PDF, name the file:
YYYY-MM-DD Subject of Correspondence (attachments enclosed).pdf

If it is not possible to combine all attachments with their enclosing email into one PDF or do so while maintaining the files' original formatting (such as excel reports), add the attachments and the enclosing email directly to the appropriate folder and name the files:
YYYY-MM-DD Subject of Correspondence (enclosing email).pdf
YYYY-MM-DD Name of File Attachment (attachment)

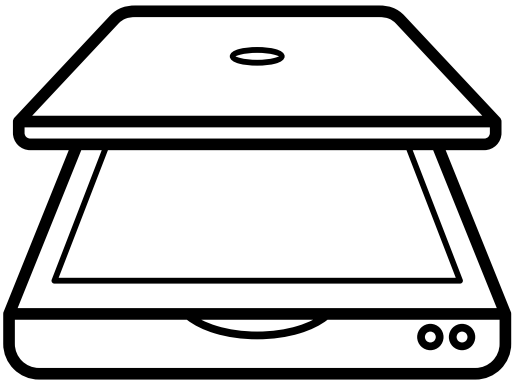
For Official NAGPRA correspondence, there will be one letter per representative for each Tribe attached to the email, labeled as:
YYYY-MM-DD Subject of Correspondence Letter ##

Official NAGPRA letters should be filed directly into the Tribe's folder along with its enclosing email. These files should be named as follows:

Official NAGPRA Correspondence email: **YYYY-MM-DD Subject of Correspondence (enclosing email)**
Each letter per representative: **YYYY-MM-DD Subject of Correspondence Letter ##**

Scanning Protocols

Some older repatriation records may exist only in paper form and may not yet be included in digital files. When possible, these materials should be scanned and incorporated into the digital record so that related documentation is preserved together and can be more easily accessed, managed, and shared as needed.



Things to consider:

- Where are the digitized files going?
- Are these being digitally repatriated with the rest of the collection?
- Will a copy be held at the museum?
- How much storage space do we have for these files?
- Are files being saved on an external hard drive as well?
- Is there a metadata spreadsheet?
- Is there any AV material that needs to be digitized in the collection? Are the PDFs searchable? Ideally, they should be.
- If things are going back to the Tribes, then a higher resolution can be used.

Documents

1. Being sure that the white matte background is in place on the top part of the scanner, place the documents face down on the scanner.
2. Set the **DPI to 300** for optimal OCR results. This can be adjusted as needed depending on the type of document and where it is going to be kept.
3. Unless the paper is highly colored or contains information that will be lost if not kept in color, set the color setting to **16-bit greyscale**. If you must maintain color, set the color setting to 24-bit color.
4. Using the "Preview" scan function, adjust the scan area as necessary
5. Using the guidance in the previous sections, name the scanned documents appropriately, saving to the proper folder.
6. If the document is a multi-page document, press the "Add Page" button when prompted, continuing to do so until all the pages are scanned.
7. The pages may require that the orientation of the scanner be rotated. Use the "Preview" button as necessary in order to ensure that the pages are at the proper rotation.
8. Make sure the documents are saved in the PDF (.pdf) format. If the documents have images on them or highly stylized writing a TIFF (.tiff) should be used.