



June 16, 2023

**Via U.S. mail and electronic mail**

The Honorable Brian Schatz  
Chairman, Committee on Indian Affairs  
United States Senate  
Washington, D.C. 20510-6450

Dear Senator Schatz:

On behalf of the Ohio History Connection, I want to express my appreciation for the opportunity to discuss our compliance with the Native American Graves Protection and Repatriation Act (NAGPRA), as requested by your April 20 letter to our institution.

When NAGPRA was enacted in 1990, the Ohio History Connection worked toward compliance, and our staff members made determinations of cultural affiliation.

But for the past 10 to 15 years, we have shifted to conducting active consultations in order to culturally affiliate Ancestors and collections and be proactive in assisting Tribes to be able to make claims and rebury their Ancestors. A watershed moment was when my predecessor as executive director and CEO realized we lacked real relationships with any federally recognized American Indian Tribes with ancestral ties to Ohio, and we set about to change that through consultation and dialogue.

These actions set us on our current path to an active repatriation program guided by Tribal Partners, who are federally recognized tribes with ancestral ties to Ohio.

Ohio is a state with no resident tribes. Federal removal policy was sweeping and complete, with the Wyandotte being the last tribe to be removed in 1843. We are feeling those consequences still today, and any consultation with federally recognized Tribal governments who historically would have been located in Ohio involves time, distance, and, quite frankly, a history gap; we also want to avoid any further traumatization for nations who remain victims of forced removal. These are very real hurdles in the process of repatriation, which involves respect, sensitivity, communication, and, above all, the recognition that Tribal governments are working to take care of their citizens on a daily basis.

From communicating with our Tribal Partners, we have learned repatriation is not simply reburying the remains of the Ancestors. I agree the Ancestors have waited on shelves for far too long; but now that we are proactively doing the work, we must do it correctly. Every Ancestor deserves to be approached as an individual, and there is no one-size-fits-all model when it comes to repatriation of a human being.

The repatriation process is complex when a single Tribal government is involved, and it increases in scope when many of the Ancestors in our care involve consultation with nearly 60 additional Tribal governments, each with their own unique customs and traditions. Nevertheless, we are being patient and persistent in our commitment to repatriation – and the relationships we’ve built with our Tribal Partners have been invaluable to educating us and conducting this work meaningfully together.

Furthermore, our consultations often go beyond what is required by federal law and regulation. By doing so, the Ohio History Connection expresses a sincere desire to comply with NAGPRA and also to reconnect the Removal Tribes to Ohio. The staff members in our NAGPRA department have quarterly virtual Consultation meetings with the Tribes in which we update them on the progress of repatriation projects and on our work in the collections – including separating faunal from human remains, reuniting artifacts with ancestors, updates on cataloging and inventory, addressing any questions or concerns and discussing pending consultations. Aside from the quarterly Consultations, we meet informally with our Tribal Partners by phone, email and in person at other meetings and conferences. To date, these are our Consultation update meetings that have taken place:

<b>NAGPRA Consultation Update Meetings</b>
9/15/2021
11/17/2021
12/15/2021
7/6/2022
10/5/2022
11/3/2022
1/18/2023
4/19/2023

In the event of an inadvertent discovery, we open a dialogue with the Tribes whenever human remains are discovered. In October 2022, we encountered an inadvertent discovery, and by using geographic information on the location and recorded history, along with information the tribes have supplied us on areas of interest, we reached out to the Wyandotte Nation. Pre-Removal, the location where the remains were found during construction of a house was once occupied by the Wyandotte. The Tribe was notified of the exhumation of five individuals from the site. This type of exhumation is known as a “salvage” effort; in order to preserve and not destroy the remains, we were given permission by the landowner to remove them.

NAGPRA also has facilitated meetings with the Tribes regarding land set aside by the museum for repatriation of Ancestors. The location is in a historically relevant site owned by the Ohio History Connection and provides Removal Tribes with space to repatriate their Ohio ancestors *if they choose* to utilize the location. We have the support of our Tribal Partners for a recent Ohio Revised Code amendment to facilitate NAGPRA-related reburials on designated property owned by the state or our organization.

Our annual in-person Ohio Tribal Nations Conference has been held since 2015. We share this conference with the Federal Highway Administration’s Ohio Division and the Ohio Department

of Transportation. The conference has helped to move to meaningful consultation regarding NAGPRA and Section 106 (36 CFR Part 800). This is where many of the relationships between the museum and tribes, which are so important in repatriation work, were born. It has also given an opportunity to the tribes removed from Ohio to reconnect with places sacred to them, such as Serpent Mound in southwestern Ohio.

We consistently meet with the Delaware Nation, Delaware Tribe of Indians, Forest County Potawatomi Community, Match-e-be-nash-she-wish Band of Pottawatomis of Michigan, Meskwaki (Sac and Fox Tribe of Mississippi in Iowa), Miami Tribe of Oklahoma, Pokagon Band of Potawatomi Indians, Shawnee Tribe, Eastern Shawnee Tribe, Seneca-Cayuga, Seneca and Wyandotte Nation. We also are in contact with other Tribal governments.

We have taken other strides forward with Tribal representation over the past decade, including:

- Hiring Ms. Stacey Halfmoon (Caddo Nation) in 2016 to serve as our Director of American Indian Relations. She was the first American Indian individual to serve in that role.
- Hiring Dr. Alex Wesaw (Pokagon Band of Potawatomi Indians) in 2020 to succeed Ms. Halfmoon. Dr. Wesaw's tribe is historically connected to Ohio. Dr. Wesaw oversees our organization's compliance with our American Indian Policy.
- Establishing a standalone American Indian Relations Division in 2021 after our Board of Trustees approved our [American Indian Relations Policy](#) in 2019. Our policy has sections dealing exclusively with Care of the Ancestral Remains, Funerary Objects, and Cultural Objects, as well as Consultation with Tribal Nations.
- Creating a NAGPRA department in the American Indian Relations Division, and its sole focus is repatriation and care of the Ancestors.
- Hiring Ms. Nekole Alligood (Delaware Nation) in 2021 to serve as our NAGPRA Specialist. Ms. Alligood's tribe is historically connected to Ohio.
- Changing our bylaws to have a representative of a federally recognized Tribe serve on our board of trustees, a position currently held by Chief Billy Friend of the Wyandotte Nation.

I would encourage you to reach out to leaders of the Historic Ohio Tribes for their perspectives, as well, and a few of their testimonies are included as supporting documents to this letter. Because the Director of our American Indian Relations Division and our NAGPRA Specialist are both citizens of Tribal governments who have historic connections to Ohio, we have developed a reputation as a safe haven for Ancestors, both those who have been in our care for any years and for those who will continue to come into our care. We carry out a number of responsibilities for the state of Ohio, and stewardship of ancestral remains surrendered to the state is one of them.

As we have worked alongside our Tribal Partners to care for the Ancestors and associated items in our stewardship, leading to large-scale repatriation as outlined by NAGPRA, we continue to recognize it requires many resources and time commitments – for both institutions like ours and the federally recognized Tribes who are involved. Tribal governments that are going to be overwhelmed with requests for assistance from museums should be supported, and I hope that increased funding will be one of your next steps now that this conversation has been started.

I trust this context will prove helpful as you and your colleagues in the Senate and on the committee read the requested responses that begin on Page 5 of this letter, and I want to reiterate my appreciation for this opportunity. The Ohio History Connection has changed its approach to NAGPRA to be a proactive partner in the goal of reburying the Ancestors. We cannot change our past, but I can promise our intention for a better future.

Sincerely,

A handwritten signature in black ink, appearing to read "Megan Wood". The signature is fluid and cursive, with the first name "Megan" written in a larger, more prominent script than the last name "Wood".

Megan Wood  
Executive Director & CEO

**1) Please describe in detail how your institution determines if there is “a relationship of shared group identity that may be reasonably traced” when your institution is determining how cultural affiliation of NAGPRA-eligible items or ancestral remains, and explain how your institution interprets and applies the terms “totality of the circumstances” and “preponderance of the evidence” when making such determinations.**

The Ohio History Connection follows the criteria for determining cultural affiliation pursuant to 43 CFR 10.14. We use the following requirements to determine cultural affiliation between a present-day Indian tribe or Native Hawaiian organization and the human remains, funerary objects, sacred objects, or objects of cultural patrimony of an earlier group.

For Ancestors from Ohio, during the development of our strategic plan, treaties, acts of Congress, executive orders, final decisions of the Indian Claims Commission and Court of Claims, as well as information provided by Indian Tribes, were used to identify as many Tribes as possible who may have an interest in Ohio. On Sept. 15, 2021, we hosted the first of a continuing series of intertribal consultations. 66 Indian Tribes, including the six Minnesota Chippewa Bands and two Michigan Historic Tribes were invited. We hosted an in-person intertribal consultation in November 2021 and consulted virtually again in December. We did not consult again until July 2022, when we transitioned to quarterly consultations, which are ongoing. This pause was with the support of the Tribes and allowed our NAGPRA Specialist to move from Oklahoma to Ohio. This position was newly created in 2021. Our NAGPRA Specialist manages the day-to-day efforts of our NAGPRA department.

We use treaties and geography to approach consultation. I think it would be helpful to understand we often have no information about the Ancestors in our care. If we have information about the Ancestors, it generally comes from the field notes provided by the people (professional and avocational) who removed them from their resting places. Through treaties and understanding the geographic locations of where American Indian people once lived, and the locations of where Ancestors were removed from the earth, we can speculate what tribe(s) may be potential descendants. We work with the tribes to understand as precisely as possible where their ancestors once lived using their indigenous knowledge of their homelands and migration routes.

This means our consultations involve several American Indian Tribes who are provided all the information possible about the Ancestors and their belongings. We consult on the inventory of Ancestors (known as MNIs or Minimal Number of Individuals) and the material objects found with them. Once the inventories have been reviewed and approved by the tribes, they are submitted to the National NAGPRA Office and eventually placed on the inventory per institution. The Tribes guide us in this process for a number of reasons.

For example, we have several collections where human remains are comingled with faunal (animal) bone. We also find that opening a box which supposedly houses one individual often reveals comingled human remains resulting in the identification of more than one person within. Through, primarily, in-person and virtual consultations we learned the tribes would prefer that comingled collections be reviewed and separated, particularly animal from human. There is very little we do which does not involve tribal input. Therefore, we are going through the entire collection box by box as requested by the tribes. We are making sure the animal remains are separated from the human remains. We are also verifying the minimum number of individuals

by reviewing the human remains box by box as well. Through these processes we are able to present a more accurate inventory and reunite material culture with the Ancestor remains.

Pursuant to §10.14(d) the Ohio History Connection makes a finding of cultural affiliation for Ancestors and associated funerary objects based upon an overall evaluation of the totality of the circumstances, and decisions are not precluded solely because of some gaps in the record.

Pursuant to §10.14(e) when making cultural affiliation determinations, the Ohio History Connection considers all the available lines of evidence, including geographical, kinship, biological, archeological, anthropological, linguistic, folklore, oral tradition, historical, or other relevant information or expert opinion. Even one line of evidence is sufficient to make a cultural affiliation determination. However, we defer to the Tribes.

Since we have implemented our institution's American Indian Policy, in 2019, all that we do, we consult with the Tribes. They guide us on what is culturally identifiable or not, along with what information we have from the sites (collections) being examined. We present that information to the Tribes, and they make the determination on how we proceed. Their knowledge of their history regarding what objects are spiritual or sacred, where they once lived and the time period from which the Ancestors come from all are considered in determining their cultural affiliation.

Ohio History Connection has explored multiple options for our repatriation efforts. We took the concept of conducting large repatriations to our Tribal Partners and were directed that was not something they wished to entertain. The Tribes made it clear they do not want to take large dispositions of Ancestor remains. Perhaps this is hard to grasp, but they want to rebury their people, not a huge group who may or may not be their Ancestors. They have also asked us to reunite the Ancestor remains with their material objects. Museums have an interesting cataloging methodology which involves separating categories of objects. Therefore, burials were further desecrated upon arriving in a museum. Here, the items they were buried with often end up in the archaeology collection (lithic pieces such as arrow points) or the ethnographic collection (textiles, regalia, grave accessories). Given we have more than 7000 Ancestor remains and over one hundred thousand artifacts, this is not a task done quickly.

Pursuant to §10.14(f) cultural affiliation determinations are based on a preponderance of the evidence using the reasonable basis standard which for us is the determination that would be made by a reasonable person with no specialized training, and only presented with the available evidence. These determinations are made in consultation with the Tribes and ultimately left to the Tribes.

**2) Please describe the process your institution undertakes to determine –**  
**a. When there is sufficient evidence to proceed with repatriation; and**  
**b. When a cultural item or ancestral remain is culturally unidentifiable.**

2a) If “repatriation” is defined as describing the Ancestors and associated funerary objects in a culturally affiliated inventory, we proceed as described in section 1. “Repatriation,” the act of transferring legal control, is done no sooner than 30 days after a Notice of Inventory Completion is published in the Federal Register and after the receipt of a repatriation request from a culturally affiliated Indian Tribe.

2b) The Ohio History Connection does not predetermine cultural affiliation for cultural items that may be sacred objects, objects of cultural patrimony, or unassociated funerary objects. Pursuant to 43 CFR 10.10, we will publish a Notice of Intent to Repatriate upon receipt of a valid claim from a culturally affiliated Indian Tribe. For a claim to be valid, our Policy states the Indian Tribe must be federally recognized and be culturally affiliated, and the item must meet at least one of the definitions. The level of proof for determining if a claim is valid is a preponderance of the evidence.

For Ancestors and associated funerary objects, we defer to the Tribes as described above.

**3) Please describe the processes and methods your institution uses to gather and utilize Native traditional knowledge when determining the cultural affiliation of NAGPRA-eligible items or ancestral remains.**

We consult with the Tribes. They guide us on what is culturally identifiable or not, along with what information we have from the sites (collections) being examined. We present that information to the Tribes, and they make the determination on how we proceed. Their knowledge of their history regarding what objects are spiritual or sacred, where they once lived, and the time period from which the Ancestors come from all are considered in determining their cultural affiliation. We also employ an American Indian NAGPRA Specialist and American Indian Relations Director, both of whom are descendants of tribes once living in Ohio or moved into Ohio through frontier expansion.

**4) Please provide examples of when your institution has used only Native traditional knowledge to culturally affiliation of NAGPRA-eligible items or ancestral remains.**

To date, our institution has not had a Tribal Partner request to affiliate any of the Ancestors, or their objects, in our care based solely on Native traditional knowledge. However, we would welcome the opportunity to work with the Tribes to make such affiliations, when appropriate, if one were to come forward with a claim and evidence.

Separately, our institution has collaborated with Tribal Partners to learn about and understand their Indigenous traditional knowledge and have worked to incorporate it into our ways and care of the Ancestors and their belongings. The first collaborative archaeological research with American Indians in our institution's history began in September 2016. Chief Ben Barnes and Dr. Brad Lepper, our Senior Archaeologist, gave joint presentations at an archaeological conference in 2016, a special presentation for the Glenn Black Laboratory in Indiana in 2017, and published a technical paper in 2018 in *Archaeologies*, the journal of the World Archaeological Congress. Chief Barnes and Dr. Lepper followed that up in 2019 with a report in the online journal *Current Research in Ohio Archaeology*. That research was featured in a temporary exhibit at the Ohio History Center, which was also something of a first in terms of public education.

While this may not be directly relevant to NAGPRA, it shows a willingness to work together with our Tribal Partners towards the common goal of better understanding the Indigenous Precontact history of the lands now known as Ohio. And it certainly has important implications for NAGPRA, as it shows that Tribal governments retain knowledge that enables them to interpret many of the ancient American Indian objects in our collections.

**5) Please describe each allegation filed with the National NAGPRA Program regarding your institution's failure to comply with NAGPRA, including a summary of the circumstances and outcomes of the allegation(s).**

The Ohio History Connection has not had an allegation filed with the National NAGPRA Program against our institution. We are in compliance with NAGPRA and the associated regulations.

**6) Please describe the process your institution undertakes to complete summaries and inventories pursuant to 43 C.F.R. 10.8 and 43 CFR 10.9, including the average length of time to complete the average length of time for completion and the average length of time to send the required notice of intent to repatriate to the manager of the National NAGPRA Program**

**a. For each summary prepared by your institution, please explain whether the determination listed in the summary as sacred, possibly sacred, patrimonial, or unassociated funerary objects was made by i) museum staff or ii) in consultation with tribal representatives or iii) some combination of (i) and (ii).**

**b. For each inventory prepared by your institution, please explain whether the determination of human remains or associated funerary objects as either culturally affiliated or unaffiliated was made by i) museum staff or ii) in consultation with tribal representatives or iii) some combination of (i) and (ii).**

6a) Historically, because of the vast number of materials and time constraints to have them reviewed and sent out, summaries were sent based on museum staff (i) interpretations. These summaries were sent largely based on paper records. Summaries were initially sent out 1994–1997. The original summaries were submitted to the National NAGPRA Program in 1997. These included objects identified by museum staff as sacred, possibly sacred, or patrimonial. All unassociated funerary objects were reported on inventories alongside associated funerary objects and human remains rather than on a summary.

Between 1997 and 2021, additional unassociated funerary items were received and/or found in collections. No known sacred, possibly sacred, or patrimonial objects were identified during this time. This determination was made by museum staff (i). The known unassociated funerary objects that were identified during this time were also determined by museum staff (i). These objects were not described in separate summaries but were inventoried and submitted to the National NAGPRA Program alongside human remains and associated funerary objects. At least 3,154 unassociated funerary objects have been described on inventories to the National NAGPRA Program, including those reported alongside our original 1998–1999 inventory submissions. The list of unassociated funerary objects was also shared with our Tribal Partners in December 2021.

Since the formation of our NAGPRA department in 2021, our new process is to consult with tribes on all American Indian or potentially American Indian material. We use treaties and geographic original homelands and migration routes to determine which tribes/nations to approach. During our 2022 Tribal Nations Conference, we provided an opportunity for tribal representatives to view materials and provide input. We plan to continue to consult in this way (though on a larger scale) moving forward.

Since 2021, our current process is to share all archaeological material and other known American Indian cultural objects with Tribal Partners by processing and consulting on Ohio History Connection collections county-by-county. This way, determinations of any objects as sacred, patrimonial, or funerary can be made in consultation with tribal representatives (ii). Once tribal representatives identify material as being sacred, possibly sacred, patrimonial, or unassociated funerary objects, we continue consultation, develop and publish the Notice of Intent to Repatriate (NIR), and then return the object to the tribe with consultation on proper handling.

We have thus far had one claim made on an unassociated funerary object by the Chickasaw Nation. The object was inventoried in May 2000 (as unaffiliated by museum staff). The object was a gorget, an ornamental piece worn around the neck of an individual, made of shell. This item had been removed from the burial, and later donated to the Ohio History Connection. The initial request for repatriation (claim) was made by the Chickasaw Nation on February 11, 2020. The gorget was amended to be affiliated with the Chickasaw Nation and the NIR was published October 19, 2021. The gorget was physically transferred to the Chickasaw Nation on December 13, 2021. Since this is our only completed NIR, we only have the timeframe for this item to use as a reference. The time from the claim to NIR was approximately 22 months. The time from the inventory to NIR was approximately 21 years.

6b) Historically, immediately after the NAGPRA law passed, inventories were prepared, and cultural affiliation was determined by museum staff (i). This a decision made because of the large number of human remains and associated funerary objects housed within the institution. The intent was to prioritize completing the process within a timely manner so that inventories could then be shared with the tribes. Ohio History Connection received an extension for completion, so the majority of the ancestors were inventoried (affiliated and culturally unidentifiable) in 1998 and 1999. Between 2000 and 2021, any ancestors received or found in collections were reported each year, therefore the average amount of time during this period to inventory ancestors is approximately one year. These ancestors during this time were inventoried largely by museum staff, with some cases including tribal input. In the few cases where affiliation appeared to be straightforward by museum staff (i), tribal input was sought out during the inventory process (ii). In cases where the ancestors were determined to be culturally unidentifiable (this determination was usually made because of the older time period of the ancestors), this was determined by museum staff (i).

Since our NAGPRA department was formed in 2021, all inventories are now consulted on (ii). Our invitations to consult go out to approximately 58 tribes. The tribes determine if the pending inventory possibly involves their ancestors based upon the information we have compiled and if so, they weigh in. From there, we describe the ancestors in an inventory to be submitted to National NAGPRA. In cases where the ancestors are already affiliated based on consultation, we develop and publish a Notice of Inventory Completion (NIC) and complete repatriation. We then consult on the physical care and transfer of the ancestors and their belongings.

For Removal Tribes determining affiliation is difficult since so many groups were pushed together across what is now Ohio on top of the tribes originally residing here. Therefore, there are cases where our tribal partners have asked us to describe the ancestors as culturally unidentifiable in the initial inventory. This is because we have developed a plan (with consultation) to affiliate all of the previously culturally unidentifiable ancestors housed within our facility by county. This way, the ancestors from similar areas may be repatriated together. In the case where our tribal partners ask us to inventory the ancestors as culturally unidentifiable, we do this as requested. Then, as we prepare the ancestors and their belongings from each county, we consult again so that our tribal partners may determine affiliation for all ancestors in that area (ii). We then amend the inventory to include this affiliation, and from there we publish the NIC and complete the repatriation process. We then consult with tribes for the physical care and transfer of the ancestors and their belongings.

Note: we have been approaching this county-by-county plan by applying for NAGPRA grants to support the work and consultation on groupings of counties. Currently, we are preparing the ancestors, belongings, and all other American Indian material to present to the tribes for nine counties in the northwestern corner of the state, split between 2023 and 2024. We have also applied for a grant to do the same work on another set of nine counties in 2025.

Thus far, we have completed five NICs. These primarily included a combination of museum staff (i) and tribal consultation (ii). In all cases, museum staff identified a potential affiliation. Then, they reached out to likely interested tribes (usually based on the National NAGPRA database of tribal interest based on geographic location). Ohio History Connection reached out to tribal representatives to initiate repatriation, a claim was made, and the NIC was then completed. The timeline for the process to complete a NIC has varied heavily, from two to 23 years from time of inventory to NIC publication. The timeline for consultation initiation to NIC publication is closer to 1-1.5 years (with one outlier). Below is an outline of the process for each of the five published NICs:

1. (74 FR 52505-06) Indian Island, Lucas County, Ohio NIC
  - a. The time from inventory date to NIC publication was three months.
  - b. The time from when the individuals were received, and consultation was initiated to NIC publication was 13 months.
    - i. The individuals and their belongings were received in 2007, consultation was initiated in 2007, inventoried in 2009, and the NIC was published in 2009.
2. (79 FR 27932-33) Pickaway Plains/Cornstalk/Shawneetown NIC
  - a. The time from inventory date to NIC publication was 1–16 years.
  - b. The time from consultation initiation to NIC publication was approximately 15 months.
    - i. The individuals and their belongings were received prior to NAGPRA, inventoried between 1998 and 2013 (some individuals and their belongings were found in collections after the initial inventory for this site). Consultation was initiated in 2013 and the NIC was published in 2014.
3. (80 FR 76303-04) Schoenbrunn and Gnadenhutten NIC
  - a. The time from inventory date to NIC publication was 1–14 years.
  - b. The time from consultation initiation to NIC publication was one year.
    - i. The individuals and their belongings were received prior to NAGPRA, inventoried between 2001 and 2015 (some individuals and belongings were found in collections after the initial inventory for this site). Consultation was initiated in 2014 and the NIC was published in 2015.
4. (82 FR 11626-27) Newcomerstown NIC
  - a. The time from inventory date to NIC publication was 18–19 years.
  - b. The time from consultation initiation to NIC publication was approximately one year.
    - i. The individuals and their belongings were received prior to NAGPRA, inventoried 1998-1999 and revised in 2000 (the belongings were located after the initial inventory for this site). Consultation was initiated in 2016 and the NIC was published in 2017.

5. (86 FR 35528) Montana, Blackfeet NIC
  - a. The time from inventory date to NIC publication was 23 years.
  - b. The time from consultation initiation to NIC publication was six years.
    - i. This individual was received prior to NAGPRA, inventoried in 1998. Consultation was initiated in 2015 and the NIC was published in 2021.

**7) Please describe the process your institution undertakes to determine if cultural items or ancestral remains are not culturally affiliated, including the length of time, on average, it takes to notify the Manager of the National NAGPRA Program.**

Inventories were originally developed by museum staff members with an extension provided by National NAGPRA for 3-4 years, so all initial inventories were submitted in 1998 and 1999. Museum staff continued to inventory individuals found in collections or donated in yearly reports between 2000 and 2017. Unless a connection to a specific tribe was made, these Ancestors were described as culturally unidentifiable. See our previous response to the previous question.

Since the development of the Ohio History Connection's NAGPRA department in 2021, we review individuals not yet described in an inventory because they have been found in collections or donated to our institution to go through the NAGPRA process. We take the following steps:

Once we pull together information about the Ancestors and their belongings, we present all information to our tribal partners. Based on this consultation, we either move forward with inventorying the individuals as affiliated or culturally unidentifiable. In the case that we are able to affiliate the individuals with tribal consultation, we move forward with the NIC and repatriation.

Since we currently are working on a plan to address the Ancestors on a county-by-county basis, our tribal partners may ask us to inventory the individuals as culturally unidentifiable. This is so that we are able to inventory the individuals but can assess affiliation at the time we address other individuals previously inventoried as culturally unidentifiable from a similar geographic area (for example, this was the case for an inventory sent to the national NAGPRA program on January 4, 2023).

**8) Please explain any discrepancies between your institution's estimate of the number of cultural items and culturally unidentifiable remains in your institution's possession or control, and the number reported by the National NAGPRA Program.**

The number of Ancestors in our care currently and the number reported to the National NAGPRA Program at this time is different; we have struggled to keep up with the Ancestors coming into our care and the staffing needed to care for them. However, we are working to update the National NAGPRA Program on the number of Ancestors or objects in our care and we are complying with the Future Applicability Rule (§10.13) for newly acquired human remains (Ancestors) and associated funerary objects.

Since we founded our NAGPRA department, between finding Ancestors in the collections and receiving new Ancestors, we have approximately 710 individuals in addition to those previously reported to the National NAGPRA Program. Inventories representing 11 of these individuals was sent to National NAGPRA in January 2023. The largest subset of the Ancestors (approximately 674) was received from a private non-profit who donated them to us within the last two years with the intent of them going through the NAGPRA process. Our team is working diligently to ensure that all of the Ancestors are inventoried and reported to the National NAGPRA Program within the two-years required.

We have received some collections in vastly poor condition, most of which have never been worked with since they were placed in bags or boxes. Several of these collections come from universities and colleges in Ohio who are phasing out their Anthropology programs or avocational groups led by professional archaeologists who make up various civic groups across the state. We also receive Ancestor remains from individuals found on their property, given to them or found once an older family member passes away as well as from county law enforcement and coroners.

Each of these will be consulted on prior to submitting the inventories to National NAGPRA. Our determinations on affiliation or non-affiliation will be based upon the guidance of the tribes who engage in consultation regarding them. Given the number of tribes and as mentioned above, how they were pushed together in many instances, it is possible those inventories will be submitted as unaffiliated and upon further consultation regarding their repatriation, then the tribes will either accept them as an inter-tribal reburial or one tribe will accept them with the support of the other tribes.

At the end of the day, we will likely always have Ancestors coming into our care because our institution has developed a reputation for doing this work and doing it in a way that is informed by our Tribal Partners since the adoption of our American Indian Policy in September 2019.

**9) Please provide an inventory of any human remains that are in your possession, but controlled by another agency or institution. Please also note what effort, if any, has been taken to ensure the possession of these items comply with NAGPRA.**

Please see the accompanying table below for the information requested.

Additionally, Ohio History Connection has maintained records of all individuals within our physical custody on behalf of other agencies. We have reached out periodically over the years to ensure that the other agencies have complied with NAGPRA and/or staff have checked the national NAGPRA database to confirm these individuals are reported. In the one case that they were not, we reached out to the agency to confirm that it will report the individuals and to provide aid in the process or to make a transfer of control to comply.

<b>Locality</b>	<b>Site Name</b>	<b>MNI</b>	<b>AFO</b>	<b>Agency With Control</b>
Delaware County, OH	Bagley Mound	16	58	USACOE, Huntington District curated per contract
Delaware County, OH	White Mounds I & II	1	0	USACOE, Huntington District curated per contract
Muskingum County, OH	Dillon Reservoir Mound	4	1	USACOE, Huntington District curated per contract
Perry County, OH	Groundhog Rockshelter	1	0	USDA Forest Service - Wayne National Forest curated under Cooperative Agreement
Southeast Ohio	Hocking College "Southeast Ohio" Collection	1	0	Hocking College curated under Cooperative Agreement
Lucas County, OH	Lucas County Coroner's Office Collection - Audubon Island 1999/2000	2	0	Metroparks Toledo curated under Cooperative Agreement
Lucas County, OH	Lucas County Coroner's Office Collection - Audubon Island 2007	1	0	Metroparks Toledo curated under Cooperative Agreement
Lucas County, OH	Lucas County Coroner's Office Collection - Audubon Island 2008	4	0	Metroparks Toledo curated under Cooperative Agreement
Muskingum County, OH	Nashport Mound Collection	9	1	USACOE, Huntington District
	Gabriel Site Collection	1	0	Hocking College curated under Cooperative Agreement



**Billy Friend**  
*Chief*

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**Norman Hildebrand, Jr.**  
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**Fax: 918-676-7022**

June 14, 2023

Dear Members of the U.S. Senate:

On behalf of the Wyandotte Nation, a federally recognized tribe with ancestral ties to Ohio. I want to express my appreciation and support for the work that has been done by the Ohio History Connection in their ongoing efforts to comply with the Native American Graves Protection and Repatriation Act (NAGPRA).

The Ohio History Connection (OHC) has made great strides over the past 10 years in their efforts to comply with NAGPRA and have established great working relationships with federally recognized tribes with ancestral ties to Ohio. They have been actively seeking consultation with Tribes in order to culturally affiliate ancestors and collections and be proactive in assisting Tribes to be able to make claims and rebury their Ancestors. This has allowed for a repatriation program that is guided by Tribal Partners.

As you may or may not be aware, Ohio is a state with no resident tribes. Federal removal policy was sweeping and complete, with the Wyandotte being the last tribe to be removed in 1843. The aftermath of the removal process and the consequences are still being felt today, and any consultation with the federally recognized Tribal governments who historically would have been located in Ohio involves time, distance, and, quite frankly, a history gap. For former Tribes and OHC these are very real hurdles in the process of repatriation, which requires respect, sensitivity, communication, and, above all, the recognition that Tribal governments have their own concerns and priorities to take care of their citizens on a daily basis.

One thing that has been learned is that repatriation is not simply reburying the remains of the Ancestors. As a Tribal leader I agree that our Ancestors have waited on shelves for far too long; but now the OHC staff working with tribal partners are proactively doing the work, and going to great lengths to ensure it is done correctly. The repatriation process is not just a Wyandotte issue, but many of the Ancestors in their care involve consultation with nearly sixty (60) additional Tribal governments, each with their own unique customs and traditions, the challenges at times can seem overwhelming.

I currently am serving my second term on the Ohio History Connection's Board of Trustees and have worked closely with them on the development of their American Indian Policies. I am the first tribal leader to serve in this capacity. As a Trustee I represent not only the Wyandotte Nation, but all Tribal Nations that once called Ohio home. I believe that every Ancestor deserves to be approached as an individual, and there is no one-size-fits-all model when it comes to repatriation of a human being.

I would encourage you to reach out to other leaders of the Historic Ohio Tribes for their perspectives, as well. In addition, the Director of our American Indian Relations Division and our NAPGRA Specialist on staff are both citizens of Tribal governments who have historic connections to Ohio. I believe that the Ohio History Connection has developed a reputation as a safe haven for Ancestors, both the ones who have been in their care for years and for those who will continue to come into their care. As a Tribal Leader and a Trustee, I know that the Ohio History Connection has and will continue to work diligently in their in their efforts to comply with the requirements of NAGPRA. From my own personal experience, I know that they take seriously their role of stewardship of our indigenous ancestral remains. Please feel free to contact me if you have any further questions.

Respectfully,

A handwritten signature in cursive script, appearing to read "Billy Friend".

Billy Friend  
Wyandotte Nation  
Chief



# **EASTERN SHAWNEE TRIBE OF OKLAHOMA**

12755 S. 705 Road, Wyandotte, OK 74370  
Bluejacket Building (918) 666-2435, Fax: 888-971-3905

July 15, 2023

Via U.S. mail and electronic mail

Alex Wesaw, PH.D.

Director American Indian Relations Division

800 E. 17<sup>th</sup> Ave.

Columbus, OH 43211

Dear Members of the U.S. Senate:

My name is Glenna J. Wallace and I am Chief of the Eastern Shawnee Tribe of Oklahoma. I write this letter in reference to NAGPRA issues with the Ohio Historical Connection. When the Indian Removal Act was passed in 1830, my Shawnee tribal ancestors were living on a reservation in Ohio which we shared with the Senecas. We were known as the Mixed Band of Senecas and Shawnees and were the first tribes to be forcibly removed from Ohio. The treaty was signed in 1831 and in September 1832 our ancestors left on foot or horseback for Indian Territory, arriving in December 1832. Thus my affiliation with Ohio goes back many, many years as we consider Ohio our homelands and Ohio will always have a special place in our hearts.

In 1867 following the Civil War, an omnibus treaty was signed with several tribes who had been removed from Ohio to Kansas and us, the Mixed Band, removing those Kansas tribes to the lands promised us in Indian Territory. In that same treaty, the Mixed Band became two separate tribes, the Seneca Cayuga and the Eastern Shawnee Tribe of Oklahoma. As stated, as Chief of the Eastern Shawnee Tribe my affiliation with the state of Ohio goes back several years with NAGPRA being an issue that concerns me. Thus I write to you speaking on many topics but ultimately ending with NAGPRA and the human remains there in Ohio.

I was elected Chief of the Eastern Shawnee Tribe in 2006, the first female Chief of any of the three federally recognized Shawnee Tribes, and I have been reelected four times, now beginning my eighteenth year of leadership. In 2007 I returned to Ohio to hear British author John Sugden lecture on the biography of Tecumseh which he had written. On Saturday, the following day, several of us traveled to Newark Earthwork Mounds which was a requirement of Mr. Sugden's speaking contract. Even though I had extensively studied the history of the Shawnees and Ohio for three years in preparation of a 3 year stint traveling and lecturing on tribes in Missouri who were mentioned in the Lewis and Clark journals, I had never heard of nor read of Newark Earthwork Mounds. I was dismayed when after many obstacles I was finally able to climb up the viewing platform and see Newark Earthwork Mounds for the first time. I was in utter disbelief to discover a golf course on top of these sacred mounds. At first I reveled in the immensity of the mounds with their miles of walls varying from four feet up to fourteen feet in height. I tried to fathom Native Americans 2,000 years ago bringing baskets of soil from their homelands located throughout North America to construct or add to this religious site. I was bursting with pride knowing some of these could have been my ancestors and the product or creation of their vast knowledge of astronomy, their mastery of mathematics, their creativity, their tenacity, their religious beliefs was still standing. I was in awe. But suddenly that awe turned to extreme disappointment on to anger that this sacred site was being desecrated by not only people who were playing golf on this edifice but also by the very people who were supposed to be the protectors of sacred, historical sites in Ohio, namely the Ohio Historical Society, now renamed as the Ohio Historical Connection. I left that site crying, uttering the Biblical verse, "Father forgive them for they know not what they do." In that moment, I did not know what I could do, what I was going to do, but I knew someone had to speak up about this travesty, this injustice. I could not be silent.

Thus I reached out to Ohio Historical Society, beginning our relationship which is now in its 16<sup>th</sup> year. At first it was a relationship of my constant questioning, constant pointing out of mistakes, inconsistencies, incorrect interpretations, disrespect, lack of knowledge, lack of caring. In the beginning it could be described as an adversarial relationship. No one acknowledged responsibility for Ohio History Society signing a lease with Moundbuilders Country Club through 2078. No one knew why. No one knew why the Newark Earthwork Mounds were open to the public only one day a year or in other words inaccessible 364 days a year. No one knew exactly what federally recognized tribes were. No one knew why non-federally recognized groups had the leverage they did in Ohio. No one knew why Ohio History Society didn't address the issue of human remains. And the list of other concerns seemed endless. But all that began to change when Burt Logan became the CEO of Ohio History Connection in 2010.

Burt Logan did not have a history with Indigenous people when he arrived in Columbus, Ohio. He had not worked with tribes, knew only the history as it was written hundreds of years ago with its numerous inaccuracies. But he took it upon himself to read treaties, meet with

federally recognized tribes, scour book after book and his perspective changed. He came to realize that the organization of Ohio History Society had taken the easier wrong than the harder right, a phrase he often used. Within a year or two, things changed at Ohio History Society, including the name. Soon to be known as Ohio History Connection change occurred. Throughout the Ohio History Connection, from top to bottom, there has been an awakening, perspectives have changed, priorities have been adjusted and the following actions have been taken :

The Board of Trustees adopted its first American Indian Policy to govern both interactions with contemporary American Indians as well as the treatment of ancient American Indians, their possessions, and their sites entrusted to Ohio History Connection's care.

With scant opposition, the membership voted to amend its governing documents so that an enrolled member of an Historic-Ohio Tribal Nation who does not reside within the state can serve as a Trustee.

Early on under Burt's leadership employees of Ohio History Connection realized that in order for its outreach, its relationships, and its consultations with the Ohio tribes to be genuine and fruitful, they needed a native voice within the organization; someone who came to work every day to guide and counsel them. This led to the creation of the American Indian Relations Division, and to establish the Director of the Division as a senior leadership position. They collaborated with the Delaware Tribe of Indians to return 84 ancestors to Mother Earth.

Currently, they are working with the Tribal Nations to create a cemetery at Johnston Farm and Indian Agency for the reburial of repatriated Ancestors.

Since 2016, they have collaborated with the Ohio Department of Transportation and the Federal Highways Administration to cohost this Tribal Nations Conference. The first year three tribes attended. Last year fourteen tribes attended. The attendance has increased just as the communication and cooperation between tribes and Ohio History Connection has increased.

They have addressed and eliminated or corrected erroneous interpretations and actions at Fort Ancient, Fort Recovery, Serpent Mound.

They have helped elected officials here in Ohio understand the importance and the necessity of Tribal Consultation, as evidenced by the collaborative creation of a new state park near Shawnee ancestral grounds in Greene County where a sixteen million dollar Interpretive Center honoring the three federally recognized Shawnee tribes is being constructed. Biweekly a virtual meeting is held where the tribes, the Ohio Department of Natural Resources and Ohio History Connection personnel reach consensus upon every detail.

In 2021, for the first time in nearly two hundred years, the Shawnee Tribes returned to Serpent Mound to celebrate the summer solstice and for the last three years have presented programs.

With the backing of the Ohio Attorney General, Ohio History Connection has taken legal action to acquire from the Moundbuilders Country Club its lease of the Newark Octagon Earthworks, in order to make the site fully accessible to the public. This has entailed three court battles with Ohio History being victorious in each one.

For more than a decade, they have now been collaborating with Tribal Nations and the National Park Service to inscribe the Hopewell Ceremonial Earthworks on the World Heritage List, proclaiming around the globe the genius of those who designed and built these monumental sites 2,000 years ago.

These actions have bolstered and strengthened Ohio History Connection's relationships with the Ohio tribes and are just a few of the ways they have tried to fulfill their now realized responsibilities.

Last year, quite unexpectedly, they also had the chance to repair a relationship with a non-Ohio tribe. Through happenstance, they learned that in 1996 the then-Ohio Historical Society sold 22 cultural and sacred items in its possession to the Nez Perce Tribe for \$608,100. It did not take the newly awakened Ohio History Connection long to conclude that if the Ohio History Connection had possession of those items today, they would freely and joyfully return them to their rightful home. The Board of Trustees voted to return the purchase price, and last November Chief Billy Friend, representing the Board of Trustees, Alex Wesaw, and Burt Logan traveled to Idaho and presented a check for \$608,100 to the Nez Perce Executive Committee. It was a moment leadership and employees of Ohio History Connection will cherish forever. They have truly changed in the last ten to fifteen years that I have continually conversed with them.

This September members of the Ohio History Connection and I will travel to Saudi Arabia and accept the declaration that eight mounds in Ohio will be designated as World Heritage sites. There are more than eleven hundred of these sites in the world, but the United States has only 25. This designation will be celebrated in Ohio the middle of October, a proud day in the annals of Ohio History Connection.

These undertakings, changes and victories have not occurred instantaneously. They have taken months, years. As stated previously, throughout the Ohio History Connection, from top to bottom, there has been an awakening, perspectives have changed, priorities have been adjusted and new priorities established. NAGPRA is now that top priority.

Ohio History Connection realizes their past shortcomings in this cultural obligation. They have begun the solemn, sacred process of reuniting ancestors in their care with their burial items in preparation for eventual repatriation.

Ohio History Connection now realizes its responsibilities regarding Indigenous People. The accomplishments, changes in philosophy and actions in the last decade are nothing short of phenomenal. Now they realize they have shirked their responsibilities in regard to NAGPRA

and human remains. Now they have added another full time native voice dedicated to moving them forward in addressing these issues. I have faith in them, know that NAGPRA issues will now come to the forefront, will be addressed with dramatic results.

I write on behalf of Ohio History Connection pledging that the Ohio History Connection today is not the Ohio History Connection of yesterday and will make even more dramatic NAGPRA strides in the near future. Another awakening is occurring.

Thank you for writing Ohio History Connection. Thank you for pointing out their historical record regarding NAGPRA. As a former vocal critic and now an advocate of the Ohio History Connection, I am confident you will witness long overdue dramatic changes in the near future.

Respectfully submitted,

A handwritten signature in blue ink that reads "Glenna J. Wallace". The signature is written in a cursive, flowing style.

Glenna J. Wallace, Chief  
Eastern Shawnee Tribe of Oklahoma



# Miami Tribe of Oklahoma

P.O. Box 1326—Miami, Oklahoma 74355  
Ph: 918-542-1445 Fax: 918-542-7260



## RESOLUTION 23-13

### **A RESOLUTION TO ESTABLISH AND ACKNOWLEDGE THAT INSTITUTIONS ENGAGING IN CONSULTATION FOR REPATRIATION OF ANCESTRAL HUMAN REMAINS AND THEIR FUNERARY OBJECTS AS COMPLIANT AND NOT SUBJECT TO PENALTY**

**WHEREAS**, the Miami Tribe of Oklahoma (“Tribe”) is a duly organized and federally recognized Indian Tribe under the Thomas-Rogers Oklahoma Indian Welfare Act of 1936, 49 Stat. 1967, and is governed by the terms of a Constitution and By-Laws originally approved by the Secretary of the Interior on August 16, 1939, and

**WHEREAS**, the Business Committee of the Miami Tribe of Oklahoma is authorized to enact Resolutions and act on behalf of the Miami Tribe under Article VI of the Constitution, and

**WHEREAS**, the Business Committee is authorized to take action to protect the health, well-being, and general welfare of the Tribe and its members and employees, and

**WHEREAS**, the Miami Tribe of Oklahoma, a federally recognized Indian tribe, has been conducting consultation for the repatriation of ancestral human remains and funerary objects, in accordance with NAGPRA law and its respective regulations, since 1992, and

**WHEREAS**, the Miami Tribe of Oklahoma believes that consultation, with regards to the Native American Graves Protection Repatriation Act (NAGPRA), is the combined efforts of tribal governments and institutions to coordinate and establish agreements relating to affiliation, repatriation and reinternment of ancestral human remains and funeral objects, and

**WHEREAS**, the Miami Tribe of Oklahoma believes that compliance is linked inseparably with consultation and an institution demonstrates compliance through consultation and repatriation, and

**WHEREAS**, the Miami Tribe of Oklahoma believes it has the right and obligation to our ancestors to conduct thorough, comprehensive consultation at the pace that the Tribe determines based on fiscal and logistical conditions, and

**WHEREAS**, the Miami Tribe of Oklahoma believes it has the right to determine the quantity of collections to consult for with each respective institution based on fiscal and logistic conditions, and

**WHEREAS**, the Miami Tribe of Oklahoma recognizes that neither the original NAGPRA law, nor the related regulations, possess a pro-active or preemptive enforcement capability and that such enforcement has been relegated to the Tribes by default or intent, and

**WHEREAS**, the Miami Tribe of Oklahoma understands that it possesses the authority to determine non-compliance through the utilization of the Notice of Non-Compliance complaints that are issued to National NAGPRA for the purpose of initiating an investigation, and

**WHEREAS**, the Miami Tribe of Oklahoma understands that it also possesses the authority to determine if an institution is compliant under NAGPRA law and the related regulations to the satisfaction of the Tribe, and

**WHEREAS**, the Miami Tribe of Oklahoma will not file Notice of Non-Compliance complaints against any institution currently engaged in good faith consultation with the Tribe for the repatriation of ancestral human remains and funerary objects, and

**WHEREAS**, the Miami Tribe of Oklahoma presents this resolution as a response to erroneous public media accusations of non-compliance directed at institutions that the Miami Tribe of Oklahoma is and has been in consultation with for the repatriation of ancestral human remains and funerary objects.

**NOW THEREFORE BE IT RESOLVED**, the list of institutions attached as Exhibit A reflects institutions the Miami Tribe of Oklahoma is engaged in current good faith consultation with as of June 20, 2023, for the repatriation of ancestral human remains and funerary objects.

**BE IT FURTHER RESOLVED**, the institutions listed in Exhibit A are COMPLIANT with Federal NAGPRA law and its related regulations to the satisfaction of the Tribe.

**BE IT FURTHER RESOLVED**, Indiana University, The Ohio History Connection, and Illinois State Museum accused of non-compliance through ProPublica stories are currently in consultation with the Miami Tribe of Oklahoma for the repatriation of ancestral human remains and funerary objects and are COMPLIANT with Federal NAGPRA law and its related regulations to the satisfaction of the Tribe.

**BE IT FINALLY RESOLVED**, after June 20, 2023, any institution that begins good faith consultation with the Miami Tribe of Oklahoma for the repatriation of ancestral human remains and funerary objects will be deemed COMPLIANT with Federal NAGPRA law and its related regulations to the satisfaction of the Tribe.

[Certification to Follow]

CERTIFICATION

I hereby certify that the foregoing Resolution 23-13 was passed at a Regular Meeting of the elected Business Committee of the Miami Tribe of Oklahoma on the 13<sup>th</sup> of June \_\_\_\_\_ 2023 with a vote of 5 for, 0 against, and 0 abstaining.

  
Douglas G. Lankford, Chief

ATTESTED:

  
Donya Williams, Secretary/Treasurer

## EXHIBIT A

### Compliant Institutions in Direct Consultation with the Miami Tribe of Oklahoma As of 6-20-23

#### Indiana:

Indiana University  
Indiana State Museum  
Strawtown Kotewee Park  
University of Indianapolis  
Purdue University  
Indiana National Guard – Muscatatuck  
LaPorte County Museum  
Cass County Museum  
Tippicanoe County Historical Society and Museum

#### Ohio:

Ohio History Connection  
Cincinnati Museum  
University of Cincinnati  
Cleveland State University  
Ohio University (Athens)  
Toledo Metroparks – Lucas County

#### Kentucky:

University of Kentucky  
Western Kentucky University  
Filson Museum  
Wickliffe Mounds Historical Site  
University of Louisville

#### Illinois:

University of Illinois  
Illinois State Museum  
Dickson Mounds Museum  
Kankakee Museum

#### Michigan:

Michigan State University  
USACE Detroit

#### Wisconsin:

Beloit College  
University of Wisconsin – Milwaukee  
University of Wisconsin – Oshkosh  
Mukwonago Library

Missouri:

Southeast Missouri University  
Culver-Stockton College  
USACE St. Louis

Nebraska:

University of Nebraska State Museum

New York:

SUNY Bromfield

New Jersey:

Princeton University

Georgia:

Augusta Museum

Oklahoma:

Gilcrease Museum

Kansas:

Wichita State University



## Pokégnek Bodéwadmik

POKAGON BAND OF POTAWATOMI  
HISTORY & CULTURE CENTER

6/05/2023

{Insert name and address here}

Letter of Support for the Ohio History Connection and its Compliance with the Native American Graves Protection and Repatriation Act of 1990

Dear Members of the U.S. Senate:

The Pokagon Band of Potawatomi Indians has been collaborating with the Ohio History Connection (“OHC”) on NAGPRA efforts since around 2021 and has seen substantial progress in the institution’s process. Various Tribal Nations have claimed that OHC was slow to comply with NAGPRA and has held on to Ancestral Human remains and cultural heritage items for longer than desirable. Today, the OHC is much better situated to achieve repatriation in an appropriate and effective manner.

The OHC has developed an American Indian Policy which deals with Tribal Consultation and appropriate care and handling of Ancestral Remains and Cultural Heritage items. Tribal Nations were brought to the table to consult regarding the American Indian Policy to ensure that Tribal interests were considered. The OHC has recruited new employees to handle NAGPRA and since then has held approximately five NAGPRA Update meetings with Tribes (7/2022-7/2023) providing inventories and information to assist Tribes with identifying affiliation. Furthermore, the OHC successfully applied for and was awarded a grant in 2022 to continue forwarding NAGPRA efforts and is aiming to achieve repatriation of Ancestors and belongings from 9 Ohio Counties soon.

There are many logistical challenges to navigating NAGPRA appropriately and with adequate consideration of all who are possibly associated with a specific collection. In short, NAGPRA processes take quite a bit of time. One of the primary barriers is the fact that some of the Ancestral Remains and belongings do not include archaeological notes or provenience data, making the affiliation process more complicated. This generally results in Ancestral Remains and belongings being considered Culturally Unidentifiable, requiring Tribes to take an even more in-depth look to ensure the appropriate community is designated as the Transfer of Custody recipient. This significantly lengthens the consultation process but is very appropriate. It is of utmost importance that a very wide net is cast to identify possibly affiliated Tribal Nations with the collection. This requires someone to personally reach out to many Tribes (over 60 in the State of Ohio) and request their participation in the consultation. Additionally, Tribes are being contacted by many institutions regarding NAGPRA efforts and are typically inundated with requests for consultations. A smaller Tribal Historic Preservation Office or NAGPRA office may not be available to consult which in turn further slows NAGPRA process down for the inquiring institution. These are just a few of the many examples of challenges that Tribes and Institutions face when attempting to effectively achieve repatriation.



In summary, the OHC is currently making its best effort to not only comply with NAGPRA but to be proactive and transparent with their obligations and processes. We look forward to continuing this collaborative effort to successfully return and rebury the Ancestors and their belongings who have been housed with the OHC. These individuals are long past due to be reunited with Mother Earth and it is an honor to be a proponent of the process.

Sincerely,



Matthew J.N. Bussler  
Tribal Historic Preservation Officer  
Pokagon Band of Potawatomi Indians  
Office: (269) 462-4316  
Cell: (269) 519-0838  
Matthew.Bussler@Pokagonband-nsn.gov