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December 22, 2025

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RE: Annual Systemwide NAGPRA Collections Review

The attached report is submitted pursuant to Health and Safety Code § 8028.7, which requires the California State University (CSU) to provide an update on the systemwide progress in reviewing Native American human remains and cultural items held by the university and outlines actions taken to comply with the federal Native American Graves Protection and Repatriation Act (NAGPRA), California's Native American Graves Protection and Repatriation Act (CalNAGPRA), and related statutory requirements. The report summarizes progress made with systemwide policy development, oversight structures, campus leadership and training, technical and financial support, consultation efforts, and repatriation activity across the CSU system.

This report is intended to provide the Legislature with transparency into the CSU's efforts to address legal compliance, strengthen accountability, and advance timely and respectful repatriation in coordination with Tribal Nations. The information presented is relevant to legislative oversight and reflects the CSU's ongoing work to build consistent systemwide practices, respond to audit recommendations, and support government-to-government

CSU Universities
Bakersfield
Channel Islands
Chico
Dominguez Hills

East Bay
Fresno
Fullerton
Humboldt
Long Beach
Los Angeles

Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

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relationships grounded in respect for, and deference to, Tribal sovereignty.

This report is submitted pursuant to Assembly Bill 389 (2023) and Health and Safety Code § 8028.7, which require the CSU to provide an annual update to the Legislature on its systemwide progress in reviewing collections of Native American human remains and cultural items. AB 389 further directs the CSU to adopt a systemwide NAGPRA policy (which was published and implemented in November 2025), establish systemwide and campus oversight committees, and implement staffing and accountability measures to support compliance. This report fulfills the CSU's annual reporting requirement for the 2025 reporting period.

Should you have any questions about this report, please contact Nathan Dietrich, assistant vice chancellor, Advocacy and State Relations at (916) 445-5983.

Sincerely,



Patrick J. Lenz

Interim Executive Vice Chancellor and
Chief Financial Officer

PJL:skg

Full report posted to <https://www.calstate.edu/impact-of-the-csu/government/Advocacy-and-State-Relations/Pages/legislative-reports.aspx>

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**Annual Systemwide Collections Review Report
Progress Report Pursuant to AB 389 and Health & Safety Code § 8028.7**

**The California State University
Prepared by the Office of Tribal Relations**

December 22, 2025

Introduction and Background

The California State University (CSU) acknowledges that meaningful progress in the repatriation of Native American ancestral remains and cultural items has been long overdue and that delays caused harm to Tribal Nations and Native communities. The CSU is committed to addressing this history through sustained action, transparency, and accountability, and to rebuilding trust with Tribal Nations through respectful, government-to-government engagement. This work is carried out in accordance with the federal Native American Graves Protection and Repatriation Act (NAGPRA), California's Native American Graves Protection and Repatriation Act (CalNAGPRA), and California Assembly Bill 389 of 2023 (AB 389), which together affirm Tribal sovereignty, meaningful consultation, and ethical stewardship.

Effective January 2024, AB 389 established clear systemwide requirements intended to strengthen oversight and ensure consistent compliance across the CSU. These requirements include adoption of a systemwide NAGPRA policy; establishment of systemwide and campus-level oversight committees; employment of full-time, experienced repatriation coordinators at campuses with collections; and a prohibition on the use of Native American ancestral remains and cultural items for teaching, research, or display. Collectively, these measures reinforce the CSU's responsibility to advance repatriation in a manner that is timely, respectful, and aligned with Tribal cultural protocols.

This report is submitted pursuant to AB 389 and Health and Safety Code section 8028.7 and provides the Legislature with an update on the CSU's systemwide progress in reviewing its collections of Native American human remains and cultural items. It describes the policies, oversight structures, leadership roles, training, technical support, funding, and campus actions that have been implemented to support compliance and repatriation. The sections that follow outline how these efforts are working together to promote accountability, rebuild trust, and support sustained progress across the CSU system.

CSU Systemwide NAGPRA Progress

Systemwide NAGPRA Policy

In response to AB 389 and the 2023 California State Auditor's recommendations, the CSU developed and adopted its first-ever Systemwide NAGPRA Policy in November 2025 to establish a consistent, transparent, and accountable framework for repatriation across all campuses. The policy defines campus responsibilities, strengthens consultation requirements, and standardizes processes in alignment with federal and state law. Implementation is supported through systemwide and campus NAGPRA committees, required training, and ongoing monitoring by the Chancellor's Office.

The policy was developed through an extensive and sustained Tribal engagement process. Over more than a year and a half, the CSU conducted more than 30 Tribal outreach sessions statewide, both in person and virtually, and held one-on-one consultation meetings with every Tribal Nation that requested consultation. These engagements were designed to maximize accessibility, ensure regional representation, and center Tribal priorities throughout development.

Consistent with guidance from the Native American Heritage Commission (NAHC), the policy was initially issued in interim form to allow for continued Tribal input prior to finalization. Feedback was solicited from Tribal Nations, the NAHC, CSU faculty, staff, students, and the public, and was reviewed and incorporated where appropriate. This process resulted in substantive revisions that strengthened consultation, clarified campus obligations, and aligned the policy with updated federal NAGPRA regulations.

The Systemwide NAGPRA Policy is designed as a living document and includes a commitment to reopen the policy one year after implementation for review and revision, guided by continued Tribal consultation. Following the one-year review, the policy will be reviewed every two years, accompanied by Tribal consultation. This approach ensures ongoing responsiveness while maintaining consistency and accountability across the CSU system.

Systemwide and Campus NAGPRA Committees

Pursuant to AB 389, the State Auditor's recommendations, and the Systemwide NAGPRA Policy, the CSU has established NAGPRA oversight committees at both the systemwide and campus levels to strengthen accountability, transparency, and consistent oversight of repatriation efforts. These committees directly address the Auditor's findings regarding the need for centralized monitoring and sustained compliance.

Each CSU campus with NAGPRA or CalNAGPRA collections has established a Campus NAGPRA Committee with at least one appointed member and is meeting on a regular basis. Campus committees review repatriation claims, support Tribal consultation, and ensure campus-level compliance with federal and state law. Meeting frequency continues to increase as additional members are appointed through the NAHC nomination process.

At the systemwide level, the CSU Systemwide NAGPRA Committee currently includes five appointed members and meets monthly. These meetings support AB 389's intent for active

oversight by monitoring systemwide trends, reviewing reporting data, and elevating issues requiring coordinated or corrective action. This structure supports accurate legislative reporting and transparency.

The Chancellor's Office anticipates the Systemwide Committee reaching full membership in 2026 as the NAHC continues to review and nominate additional representatives.

Campus Leadership

Systemwide leadership and accountability have been strengthened through the establishment of dedicated NAGPRA leadership on every campus. All CSU campuses with NAGPRA collections now have a full-time NAGPRA Coordinator and a Presidential Designee, as required by AB 389 and the Systemwide NAGPRA Policy. These roles ensure executive-level oversight, clear authority, and sustained focus on repatriation work.

To support consistent implementation and communication, the Chancellor's Office convenes multiple standing monthly meetings. Separate meetings are held for Presidential Designees and for Campus NAGPRA Coordinators, allowing for role-specific discussion and accountability. Coordinators also participate in monthly regional working groups to address regional issues, share best practices, and coordinate consultation and repatriation efforts.

Training is a required and ongoing component of this work. In 2025, the CSU held two mandatory systemwide trainings for NAGPRA Coordinators and staff: a virtual training in February and an in-person training in August. Required in-person systemwide trainings will continue on a six-month cycle to ensure staff remain aligned with evolving legal requirements, policy updates, and best practices.

Chancellor's Office Support

In addition to policy development, oversight, and reporting, the Chancellor's Office provides direct and ongoing support to campuses through the CSU Office of Tribal Relations (OTR), which serves as the centralized entity coordinating NAGPRA and CalNAGPRA compliance systemwide.

OTR works closely with campus leadership to support policy implementation, interpret federal and state requirements, and promote consistent practices. This includes reviewing bimonthly campus reports and annual Repatriation Implementation Plans, providing written and technical guidance, participating in campus meetings, and conducting site visits. OTR also works with campuses to identify and remove procedural barriers so campuses are prepared to move at the pace of Tribes and engage in repatriation in good faith.

Technical Support

To address the legal, scientific, and operational complexity of repatriation, the CSU has invested in specialized technical expertise and infrastructure. The Chancellor's Office has contracted with a professional osteologist and two attorneys with nationally recognized NAGPRA expertise to support campuses as needed.

The CSU has also implemented CollectionSpace, a standardized collections management database that supports consistent inventory management, documentation, and reporting. CollectionSpace improves data integrity, transparency, and systemwide consistency.

In addition, OTR staff provide individualized, hands-on support to campuses navigating complex collections, consultation histories, or repatriation claims. This has included sustained engagement with campuses such as Bakersfield, East Bay, Chico, San Francisco, and Fresno, including assistance with inventories, consultation strategy, Federal Register notices, reunification of related collections, and coordination with Tribal Nations and external agencies.

Budget Support

As in fiscal year 2024–2025, the CSU allocated \$3.7 million in direct funding in fiscal year 2025–2026 to campuses with NAGPRA collections. Individual campus allocations range from approximately \$150,000 to \$200,000, based on collection size. These funds support staffing, Tribal consultation, Tribal reimbursements, reburial costs, documentation, storage improvements, and other repatriation-related expenses.

In addition, the Chancellor's Office has already allocated three years of systemwide funding for CollectionSpace subscriptions and onboarding and is committed to providing consistent, ongoing funding for this systemwide infrastructure. Together, these investments ensure campuses have the financial resources and technical capacity necessary to meet their repatriation obligations.

Campus Surveys and Searches

All CSU campuses have completed at least one comprehensive round of campus-wide surveys and physical searches to identify Native American ancestral remains and cultural items in their possession or control. These efforts directly respond to the State Auditor's findings and are foundational to lawful and meaningful repatriation.

Surveys and searches have been highly effective in identifying previously undocumented materials, as reflected in updated reporting tables. Because repatriation cannot occur in good faith without understanding the full scope of holdings, these efforts are treated as an ongoing compliance obligation rather than a one-time activity. Several campuses have already scheduled their next round of searches for 2026.

OTR is working with campuses to place surveys and searches on a regular schedule to ensure continuity, accountability, and transparency with Tribal Nations.

Future Plans and Conclusion

The CSU's work reflected in this report represents a sustained effort to address delays with the repatriation Native American ancestral remains and cultural items, strengthen accountability, and begin restoring trust with Tribal Nations and Native communities through transparency, follow-through, and consistent action. The CSU recognizes that rebuilding trust is an ongoing responsibility that extends beyond any single policy, funding cycle, or reporting period.

While important steps have been taken, the CSU understands that full compliance with NAGPRA and CalNAGPRA, and the restoration of strong government-to-government relationships with Tribal Nations, require continued focus, resources, and humility. The actions outlined below are intended to reinforce implementation, maintain momentum, and ensure systemwide structures remain responsive to Tribal priorities and evolving legal requirements.

Ongoing Training and Capacity Building

The CSU will continue to require regular systemwide training for campus NAGPRA Coordinators, Presidential Designees, and NAGPRA staff. As noted above, required in-person trainings will continue on a six-month cycle and will be supplemented by training embedded in monthly meetings and targeted technical assistance. These efforts reinforce legal obligations, promote consistent implementation, and support respectful, lawful repatriation practices.

Completion of Committee Appointments

The CSU will continue working with the Native American Heritage Commission to fill remaining vacancies on campus and systemwide NAGPRA Committees. Fully constituted committees are essential to sustained oversight, timely review of repatriation claims, and continued Tribal participation in decision-making. The Chancellor's Office anticipates full systemwide committee membership in the coming year.

One-Year Policy Review

Consistent with commitments made during policy development and Tribal consultation, the CSU will reopen the Systemwide NAGPRA Policy for review one year after implementation. This review will be guided by meaningful Tribal consultation and informed by implementation experience to ensure the policy remains responsive, effective, and aligned with Tribal priorities, best practices, and applicable law.

Ongoing Feedback and Tribal Engagement

The CSU will continue to receive and respond to feedback through the public feedback form and dedicated NAGPRA point of contact. These mechanisms provide ongoing opportunities for Tribal Nations, campus stakeholders, and the public to share concerns and recommendations, which will continue to inform policy implementation, training priorities, and systemwide guidance.

Development of a Systemwide Tribal Consultation Policy

Building on the Systemwide NAGPRA Policy, the CSU intends to develop a broader Systemwide Tribal Consultation Policy to strengthen consistency across CSU activities while respecting Tribal sovereignty, regional differences, and cultural protocols. Tribal voices will remain central to this effort to ensure consultation practices are meaningful and grounded in government-to-government principles.

Repatriation Data and Context

The tables included in this report on pages 7 and 8 summarize systemwide repatriation progress and identify federal, state, and local agency collections housed at CSU campuses. All campuses have completed inventory reviews and initiated consultation by sending invitations to Tribal Nations. Table 2 is included to provide context regarding the origin of many of these holdings, as a significant portion of the NAGPRA collections housed at CSU campuses are held as a result of contracts with federal, state, and local agencies under which CSU campuses serve as a NAGPRA repositories. In these instances, campuses are working collaboratively with the contracting agencies to move the NAGPRA process forward with Tribal Nations as expeditiously as possible. However, progress may be delayed when those agencies lack sufficient staffing or resources, as the agency, not the CSU, is legally responsible for leading the repatriation process and consultation with Tribes.

The CSU recognizes that Tribal Nations are receiving a significant volume of consultation requests nationwide. The Chancellor's Office is working with campuses to ensure they are prepared to proceed at the pace determined by Tribes and to defer to Tribal direction throughout the repatriation process, consistent with the CSU's commitment to uphold Tribal sovereignty.

The tables also include updates on federal notices posted in 2025. A recent federal government shutdown temporarily delayed the posting of some notices by the National NAGPRA Program. However, the CSU anticipates that the resulting backlog will be addressed as federal operations fully resume.

Conclusion

The CSU remains committed to advancing repatriation in a manner that is transparent, accountable, and centered on respect for Tribal Nations and their ancestors. The progress reflected in this report represents an important step forward, but the CSU recognizes that rebuilding trust requires sustained effort, continued listening, and consistent action over time. This responsibility extends beyond any single policy, funding cycle, or reporting period.

Through continued training, strengthened oversight, sustained funding, and meaningful Tribal engagement, the CSU is working to establish a systemwide framework capable of supporting timely, lawful, and respectful repatriation. While this work remains ongoing, the actions outlined in this report demonstrate the CSU's commitment to fulfilling its responsibilities under NAGPRA, CalNAGPRA, and AB 389, and to continuing the work of accountability, repair, and partnership with Tribal Nations across California and the nation.

Attachments:

Table 1: 2024-2025 Campus Inventory Chart

Table 2: Campus Agency Holding Chart

Table 1: CSU Campus Collections (legally controlled collections only) as reported in campuses' 2025 bimonthly progress reports and annual Repatriation Implementation Plan.

CSU Campus	Collection Review	Human Remains 2024	Human Remains (MNI) 2025	Cultural Items 2024	Cultural Items 2025	Campus Survey/Search Completed 2024-2025	2025 Federal Notices (Posted)
Bakersfield	Complete	55	24	238***	381*	Complete	0
Channel Islands	Complete	1	2	170 Boxes****	178*	Complete	0
Chico	Complete	98	76	58,422	58,422*	Complete	3
Dominguez Hills	Complete	28	25	2,260	70*	Complete	2
East Bay	Complete	148	86	13,525	3,951	Complete	0
Fresno	Complete	26	137	622 Volume*	626*	Complete	0
Fullerton	Complete	168	534	22,422 (inventory lists, lots, site records)**	22,592	Complete	0
Humboldt	Complete	0	1	23,079 (catalogs, records review)***	14,473	Complete	2
Long Beach	Complete	152	168	2,700	2,703	Complete	1
Los Angeles	Complete	2	2	30 Boxes****	182*	Complete	2
Monterey Bay	Complete	5	4	212 Boxes****	210*	Complete	1
Northridge	Complete	52	24	15,000	224*	Complete	2
Pomona	Complete	0	0	23	197	Complete	0
Sacramento	Complete	171	223	30,456	~6,164	Complete	16
San Bernardino	Complete	0	0	780	374	Complete	1
San Diego	Complete	192	115	100,000	426,865*	Complete	8
San Francisco	Complete	255	255	29,583	29,011*	Complete	2
San Jose	Complete	516	514	5,063	5,063*	Complete	3
San Luis Obispo/ Maritime ¹	Complete	10	2	3	3	Complete	1
San Marcos	Complete	0	0	0	0	Complete	0
Sonoma	Complete	317	214	1,608,328	~1,523,178	Complete	20
Stanislaus	Complete	49	49	538 Boxes****	383*	Complete	2

¹ CSU Maritime and Cal Poly San Luis Obispo have begun the integration process that will be official in the fall of 2026.

*=This is the volume count. Volume may include a combination of individual items, boxes, lots, storage bins, trays, crates, cabinets, shelves, drawers, etc. Until Tribal Consultation occurs, handling is not permitted under AB 275 and the NAGPRA Duty of Care standard.

**=Number represents review of collection records, catalogs, site records, and lot number listed in federal inventories/notifications.

***=Number calculated from records review and existing catalogs. The number is likely to increase during Tribal Consultation.

****=Inventory of boxes will be completed as part of Tribal Consultation. Until Tribal Consultation occurs, handling is not permitted under AB 275 and the Duty of Care standard.

Table 2: CSU Campus state and federal agency holdings (curation/repository collections).

Campus	Caltrans	State Parks & Rec.	Cal Fire	Other State or Local Agency	BLM	Army Corps of Eng.	Natl. Park Service	U.S. Forest Service	U.S. Fish & Wildlife	Navy	Other Federal Agency
Bakersfield	○	○		○	○	○	○	○	○	○	○
Channel Islands							○				
Chico	○	○	○	○	○	○		○			○
Dominguez Hills											
East Bay	○			○							
Fresno	○							○			
Fullerton	○	○			○		○	○		○	○
Humboldt		○			○			○			
Long Beach	○					○					
Los Angeles						○	○			○	
Monterey Bay											
Northridge				○	○			○		○	
Pomona				○	○	○					
Sacramento	○	○		○	○	○	○	○	○		○
San Bernardino					○						
San Diego	○			○						○	○
San Francisco	○				○	○					
San Jose								○			
San Luis Obispo/ Maritime ¹											
San Marcos											
Sonoma	○	○	○		○	○		○			○
Stanislaus	○		○	○	○	○	○	○			○