



January 16, 2015

Melanie O'Brian
Acting National NAGPRA Program Manager
National NAGPRA Program
National Park Service
1201 Eye Street, NW
8th floor (2253)
Washington, D.C. 20005

Dear Ms. O'Brian,

I write in regards to an important issue concerning the implementation of the Native American Graves Protection and Repatriation Act (NAGPRA). The publication of accurate Notices of Inventory Completion (NICs) by the National NAGPRA Program is a vital aspect of the process established under the statute and its regulations. To that end, I write to you with some concerns about how the NICs are formulated.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

In recent years SAA members have become aware of a number of instances in which the content and quality of NICs published by the National NAGPRA Program have been called into question. In particular, some find that the current NIC template asks for considerably more information than the statute and regulations require. Additionally, the breadth and scope of the NICs' subject matter appears to be irregular and inconsistent. Some archaeologists have pointed out a number of factual errors and inadequate cases being made for cultural affiliations. When these errors are identified in published NICs, there seems to be no process for museums or federal agencies to raise questions or challenge findings. Tangentially, there is also uncertainty about the statutory authority of the culturally-affiliated human remains database the Program maintains.

SAA is deeply committed to the successful implementation of NAGPRA. The need for a consistent, balanced, and transparent process is paramount to all interested parties. It is out of this concern that we seek your assistance in proactively addressing these matters. Would you be

willing to work with the SAA and its members to begin a meaningful dialogue about improving and clarifying the legal foundations of the NIC process?

We look forward to your answer, and hopefully to working with the Program in the months ahead on successfully realizing NAGPRA's goals.

Sincerely,

A handwritten signature in cursive script, reading "Jeffrey H. Altschul". The signature is written in a dark ink and is positioned above the printed name.

Jeffrey H. Altschul, Ph.D, RPA
President