

June 22, 2022

To whom it may concern,

I write to you on behalf of the William S. Webb Museum of Anthropology at the University of Kentucky, to express my concerns about proposed revisions to the Native American Graves Protection and Repatriation Act (NAGPRA) regulations now under Office of Management and Budget review.

The Webb Museum serves as the main repository for archaeological materials for/from the Commonwealth of Kentucky. Founded in 1931, the ‘foundation’ of the collections we house were the results of the Works Progress Administration excavations during the Great Depression, the great majority of which fall under the purview of NAGPRA.

This past spring, I participated in a symposium at the Society for American Archaeology in which several tribal members and NAGPRA representatives of museums with extremely large Native American collections discussed the proposed regulatory changes, among other topics. Many of these museums, like the Webb, are already non-compliant with existing regulations due to insufficient staffing and related resources. There is great concern among both tribes and museums, that the proposed regulatory changes requiring an updated inventory may prevent *meaningful* consultations from taking place in the process. Despite being non-compliant, many of us are working toward compliance but financial limitations to staffing (for museums *and* tribes) are a huge part of the limitations on what is possible.

While I think many of the proposed changes are positive, and more than doable for the majority of institutions, for those of us who are working with extremely large collections (often with old, inaccurate, and missing records) it would not only be impossible to follow the new timeline but would be absolutely impossible to engage in meaningful consultations in the process; the end result would be a repeat of 1990- inaccurate summaries and inventories submitted in order to meet a deadline instead of actually upholding the spirit of NAGPRA.

Thank you for your consideration of my views on this very important matter.

Sincerely,

Celise Chilcote-Fricker

Celise Chilcote-Fricker, PhD
Assistant Professor, Department of Anthropology
NAGPRA Coordinator, William S. Webb Museum
University of Kentucky
Telephone: (859)257-5124

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