

2022-107 AUDIT SCOPE AND OBJECTIVES

California State University—

Native American Graves Protection and Repatriation Act Compliance

The audit by the California State Auditor will provide independently developed and verified information related to the California State University (CSU) system's compliance with both the Native American Graves Protection and Repatriation Act (NAGPRA) and California Native American Graves Protection and Repatriation Act of 2001 (CalNAGPRA). The audit's scope will include, but not be limited to, the following activities:

1. Review and evaluate the laws, rules, and regulations significant to the audit objectives.
2. Evaluate the oversight activities related to NAGPRA and CalNAGPRA performed by the CSU Office of the Chancellor, including but not limited to any policies, practices, and efforts to implement NAGPRA oversight committees.
3. Survey all CSU campuses to determine what remains and artifacts are in their possession and the remains and artifacts that they have repatriated since 1990. To the extent possible, also determine when remains and artifacts were repatriated, where they were repatriated, and to whom they were repatriated.
4. For a selection of four CSU campuses, including Chico and San José, determine whether the campuses have complied with key provisions of NAGPRA and CalNAGPRA, including provisions governing the repatriation process. Determine reasons for any delays in the repatriation process.
5. Review and evaluate the CSU's systemwide and selected campus policies and procedures related to the following:
 - (a) Storage and inventory management of Native American remains and artifacts, including any policies related to handling remains or artifacts.
 - (b) Addressing disputes between tribes and campuses.
 - (c) Social media use and misuse.
 - (d) The transparency of its repatriation processes.
6. Review whether the selected campuses have tribal representation that actively participates on the committees or bodies that develop and monitor campus NAGPRA and CalNAGPRA policies and staff training.
7. Evaluate how each selected campus engages with the California Native American Heritage Commission and California Native American tribal governments.
8. To the extent possible, obtain the perspective of tribal representatives who participate on CSU systemwide or campus committees, or other tribal representatives if committees do not exist, about the responsiveness of the CSU Office of the Chancellor and campuses to any concerns they have raised and the timeliness of those responses.

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9. Review and assess any other issues that are significant to the audit.