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Factors Associated with the Implementation of the Protocols for Native American Archival Materials: An Exploratory Study

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Cover Page Footnote

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FACTORS ASSOCIATED WITH THE IMPLEMENTATION OF THE PROTOCOLS FOR NATIVE AMERICAN ARCHIVAL MATERIALS: AN EXPLORATORY STUDY

Since its establishment in 2007, and its later endorsement by the Society of American Archivists (SAA) in 2018, the Protocols for Native American Archival Materials (PNAAM) have slowly begun to shape U.S. archival practice.¹ Intended for both Native and non-Native archivists, PNAAM offers guidance on how best to care for Indigenous archival materials in non-Tribal archives.² PNAAM can inform collaborative practices that are sensitive to the unethical and/or illicit ways in which archival materials about Indigenous people came to be recorded and placed in archives.³ PNAAM is a departure from past American archives practice and as such necessitates a move toward critical praxis in which “practice and critical thought confront each other constantly.”⁴ To date, the research on PNAAM has consisted primarily of case studies, policy reports, and opinion pieces.⁵ This study explores what factors affect adoption and implementation of PNAAM in practice, thereby providing insight as to how and why critical practices are accepted and implemented in archival work.

Introduction

A small but growing number of non-Tribal archives are working to implement some or all portions of PNAAM. However, uptake appears to be slower than might be expected given the existing national initiatives to rectify or reconcile injustices, such as the National Native American Boarding School Healing Coalition, and the increased recognition of the seizure and sale of Indigenous homelands for the development of “Land-Grab” universities.⁶ Although there is significant research on anticolonial, liberatory, and social justice approaches to archives work, no literature in English exists on what factors influence implementation of PNAAM at non-Tribal archives specifically.⁷

This study is both an exploration of the barriers and supportive factors that influence PNAAM implementation in non-Tribal archives, as well as an observation of moral decision-making in archives work more generally. PNAAM is a formal professional ethics protocol providing guidance for moral behavior. It was a point of contention within the profession when it was

¹ First Archivist Circle, “Protocols for Native American Archival Materials”; Society of American Archivists Council, “SAA Council Endorsement of Protocols for Native American Archival Materials.”

² “Tribe” and “Tribal” are capitalized throughout in accordance with the Native Government Center’s “Terminology Style Guide,” <https://nativegov.org/resources/terminology-style-guide/>.

³ First Archivist Circle, “Protocols for Native American Archival Materials.”

⁴ Harcourt, “Toward a Critical Praxis Theory,” 23.

⁵ Marsh et al., “Access Policies for Native American Archival Materials in the National Anthropological Archives”; Bishop, Pringle, and Tsosie, “Connecting Cline Library with Tribal Communities”; Carpenter, “Archival Initiatives for the Indigenous Collections at the American Philosophical Society”; Anderson and Maddox, “Surveying as Unsettling”; Underhill, “Protocols for Native American Archival Materials—Northern Arizona University”; Bolcer, “The Protocols for Native American Archival Materials”; Native American Protocols Forum Working Group, “Final Report.”

⁶ “Resource Database Center”; Lee and Ahtone, “Land-Grab Universities.”

⁷ For anticolonial, liberatory, and social justice approaches to archives work, see the works of Michelle Caswell, Kimberly Christen, Marika Cifor, Jarett Drake, J. J. Ghaddar, Verne Harris, Maria Montenegro, Jennifer R. O’Neal, and Tonia Sutherland among others.

introduced, in part because of concerns over compatibility with the wide access and non-bias portions of standard archival ethics. As such, the researcher identified the concept of moral conduct relevant to PNAAM implementation and examined the body of literature on PNAAM along with relevant works from literature on morality.⁸

The Protocols for Native American Archival Materials

PNAAM grew out of a 2006 meeting of nineteen Native and non-Native staff and scholars. It is intended to provide “best professional practices for culturally responsive care and use of American Indian archival material held by non-Tribal organizations.”⁹ It calls for recognition that “Native American communities have primary rights for all culturally sensitive materials that are culturally affiliated with them” by building relationships that “ensure the respectful use and care of archival material.”¹⁰

In 2007, the SAA Council appointed a taskforce to review the protocols for possible endorsement.¹¹ The taskforce solicited feedback from visitors to the SAA website, through the SAA membership list, and to SAA sections. Comments from sections in favor of endorsement cited PNAAM’s practicality and necessity. Comments from sections that raised issues or were in opposition to PNAAM fell into two major clusters: the complexity of the issue and concern about non-Indigenous researchers’ needs no longer being prioritized for some materials. In particular, one section challenged the idea that Indigenous communities’ interests in Indigenous materials should be prioritized over those of other users.¹² Comments from individuals in favor of PNAAM echoed the belief that PNAAM was practical and a good step forward. Opposing comments varied. In addition to echoing the comments from the opposing SAA sections, individual comments in opposition also questioned Tribal sovereignty itself. Although the “representativeness” of the identities of non-Indigenous drafters of PNAAM was not explicitly questioned, the commenters were concerned that Indigenous drafters of PNAAM could not “accurately represent the views of the 562 tribes currently recognized by the United States government.”¹³ In 2018, SAA finally endorsed PNAAM as a professional standard, apologizing for the delay and acknowledging that “many of the original criticisms of the Protocols were based in the language of cultural insensitivity and white supremacy.”¹⁴

⁸ The researcher is a white woman who directs a non-Tribal academic archive with significant amounts of material pertaining to Indigenous people. She has a long-term and persisting interest in critical praxis toward a resolution of care and access issues for those materials pertaining to Indigenous people that ended up under her professional purview. The researcher is grateful for exposure early in her career to proto-PNAAM practices at Northern Arizona University under the supervision of Karen Underhill, who was a coauthor of PNAAM. She is therefore biased in favor of PNAAM. Her motivation in most of her research is to identify empathetic, pragmatic, and actionable ways to rectify archival practice—part of which is understanding why archivists are unable to implement practices like PNAAM even when they are interested in doing so.

⁹ First Archivist Circle, “Protocols for Native American Archival Materials.”

¹⁰ First Archivist Circle, “Protocols for Native American Archival Materials.”

¹¹ Boles, George-Shongo, and Weideman, “Report.”

¹² Boles, George-Shongo, and Weideman, “Report.”

¹³ Boles, George-Shongo, and Weideman, “Report,” 11.

¹⁴ Society of American Archivists Council, “SAA Council Endorsement of Protocols for Native American Archival Materials.”

Despite the initial SAA controversy, non-Tribal archives continue to slowly implement PNAAM. Closely related to this study, Elizabeth Joffrion and Natalia Fernández's 2015 survey of archivists, special collections librarians, and educators looked at collaborations between Tribal and non-Tribal organizations and the degree to which PNAAM was used in these collaborations. They found that the activities reported by their thirty-one respondents "align clearly with the recommendations of the Protocols for Native American Archival Materials." Joffrion and Fernández conclude with a series of recommendations calling for flexibility, working slowly, clear communication, realistic goals, respecting cultural difference, and committed and equitable support, among others.¹⁵ As of this writing, at least eight organizations have now endorsed PNAAM and at least twenty-five repositories have publicly identified themselves as doing at least some work toward PNAAM implementation, including museums, libraries, archives, and historical societies.¹⁶ PNAAM also appears as a recommended resource in both *Describing Archives: A Content Standard* and the Online Archive of California/Calisphere Contributor Help Center.¹⁷ Given that Joffrion and Fernández engaged with thirty-one survey respondents, the number of repositories actually engaging in PNAAM in some way is likely higher than the twenty-five repositories identified by this researcher as currently doing some work toward PNAAM.

Indigenous Materials in Archival Professional Literature Prior to PNAAM

PNAAM is not the first discussion in the archival literature about Indigenous materials in non-Tribal archives. However, early works are steeped in whiteness or overt racism. An early *American Archivist* article presumed to claim an understanding of Cherokee memory and recordkeeping practices from the eighteenth century and described the eventual violent seizure of these records and their placement in the Library of Congress. The article was written without naming the appropriation as a seizure and without analysis of the impact of this loss on Cherokee people, but did note that the seizure of these records was "fortune[ate] for the historian."¹⁸ Another paper touched on reference services for Bureau of Indian Affairs (BIA) records but assumed the primary values of the records were for the BIA itself or nonspecific historical researchers. The author did not seem to consider the values these materials might have held for Indigenous communities

¹⁵ Joffrion and Fernández, "Collaborations between Tribal and Nontribal Organizations," 203.

¹⁶ Free, "ACRL Endorses Protocols for Native American Materials"; "Society of Southwest Archivists Endorses Protocols"; First Archivist Circle, "Protocols for Native American Archival Materials"; Joffrion and Fernández, "Collaborations between Tribal and Nontribal Organizations"; Buchanan et al., "Toward Inclusive Reading Rooms"; Marsh et al., "Access Policies for Native American Archival Materials in the National Anthropological Archives"; "Shared Stewardship and Ethical Returns"; Ryan, "Identifying Culturally Sensitive American Indian Material in a Non-Tribal Institution"; Bishop, Pringle, and Tsosie, "Connecting Cline Library with Tribal Communities"; Fernández and Lewis, "Developing and Organizing an Archival Education Training Opportunity"; Reyes-Escudero and Cox, "Survey, Understanding, and Ethical Stewardship of Indigenous Collections"; Anderson and Maddox, "Surveying as Unsettling"; Vallier, "UW Ethnomusicology Archives"; Sanchez et al., "Our Sustained Commitment to Native Communities"; "Protocols for Native American Archival Materials"; "Native American Materials"; Arias, "Research Guides"; Carpenter, "Archival Initiatives for the Indigenous Collections at the American Philosophical Society."

¹⁷ Society of American Archivists' Technical Subcommittee on Describing Archives: A Content Standard (TS-DACS), "Statement of Principles"; "Shared Readings, Resources, and Considerations."

¹⁸ Alden, "The Eighteenth Century Cherokee Archives."

directly.¹⁹ Other articles simply assumed Indigenous peoples were all killed or in the process of dying off.²⁰

Discourse shifted in the 1970s. Herman J. Viola's 1974 article on Indigenous historical writings argued for the value and validity of histories written by Indigenous authors or published by Tribes over those by white authors.²¹ Of particular note is William T. Hagan's 1978 article on Indigenous materials in non-Tribal archives. Hagan pointed out that archives about Indigenous people were controlled by "non-Indian historians and ethnohistorians." He observed that the stakes were high for Indigenous communities, including "the validity of their claims to millions of acres of land and to compensation for injustices suffered in earlier transactions with the federal and state governments." He concluded with a plea for archivists to realize the real power they hold to help or harm justice efforts.²² Hagan's article, however, assumes a non-Indigenous audience, thereby perpetuating a perception of otherness for Indigenous people. In his article, Indigenous people are subjects of records or personal friends and acquaintances but not memory workers or archivists. Still, Hagan's article was the first published recognition by an American archivist of the social justice problems and possibilities of Indigenous materials in non-Tribal archives. After Hagan, the next major writing from the profession on Indigenous materials in non-Tribal archives was Donald L. Fixico's assessment of the research and reference needs of Indigenous researchers. Like earlier works, it included some questionable framing of Indigenous research methods ("Indian Logic") but made an attempt to recognize that Indigenous communities need access to their own materials.²³

The remainder of the 1980s, 1990s, and early 2000s produced little literature in American archival or library journals about Indigenous materials in non-Tribal archives. The Native American Graves Protection and Repatriation Act (NAGPRA) passed in 1990 but would not be identified in archival discourse as having direct relevance to archival materials until PNAAM and then again in the 2020s.²⁴ In 1992, a federal commission produced the *Pathways to Excellence* report on information services echoing Viola's, Hagan's, and Fixico's nascent recognition that Indigenous people's knowledge and expertise hold value. It called for federal funding to support the expansion of Tribal libraries to include archives and archival programs and to recruit Indigenous people as archivists and librarians.²⁵

The Literature on Ethical Archival Decision-Making

There is a large body of literature on archival ethics more broadly, typically focusing on areas like replevin, privacy, justice, the efficacy of codes of ethics, and the ethics of digitization and digital

¹⁹ Kahn, "Librarians and Archivists—Some Aspects of Their Partnership."

²⁰ Thompson, "The Collection and Preservation of Local Historical Pictures in the Minneapolis Public Library"; Dunn, "The Southwest Collection at 'Texas Tech.'"

²¹ Viola, "Some Recent Writings on the American Indian."

²² Hagan, "Archival Captive—The American Indian," 138, 139.

²³ Fixico, "The Native American Researcher," 8.

²⁴ Kirakosian and Gates, "Following Warren K. Moorehead's Paper Trail"; RMP Project Team, "Repatriation Meets the Protocols Resource Guide."

²⁵ United States National Commission on Libraries and Information Science, *Pathways to Excellence*.

preservation.²⁶ This study is concerned more with decision-making and moral action in archives than the general topic of professional ethics or ethics and archives.

The limited literature on ethical decision-making in archival work includes an introduction of the concept of phronesis to archival judgment, a dissertation on decision-making in building digitized collections, and an assessment of archivists convicted of theft from the collections they stewarded.²⁷ Adebowale Jeremy Adetayo argues for a phronetic approach when faced with ethical dilemmas and calls for archivists to reflect on their personal values and biases, engage in professional development, develop awareness of the broader social and political contexts in which they work, and collaborate and engage in order to build trust and legitimacy with stakeholders.²⁸ Ellen LeClere describes decision-making by the archivists in her study as comprising both decisions made by committees and individual decision-making, but justifications for this work were not directly tied to codes of ethics or moral conduct. Rather, the archivists interviewed primarily focused on increased access to materials, challenging “reductionist narratives,” availability of funding, preservation, promotion of the repository, and responding to researchers’ and subjects’ needs.²⁹ In her exploration of archivists who have criminal convictions related to their work, Sarah Davy concludes, “Poor archival decision-making can therefore occur when we prioritise our personal human needs of social acceptance, power and greed over safe professional boundaries and conduct at work.”³⁰ She describes dissociation and detachment as a theme—both psychological dissociation and detachment of those convicted, as well as in terms of the separation of materials themselves from their contexts through sale as individual items. This concept of disconnection and disengagement is central to theories about the moral aspects of professional work.

Moral Components of Professional Practice

Morality is defined by Bernard Gert and Joshua Gert as “codes of conduct put forth by a society or a group . . . or accepted by an individual for her own behavior” and/or “a code of conduct that, given specified conditions, would be put forward by all rational people.”³¹ PNAAM implementation has a moral component in that it puts forth guidelines for ethical professional conduct and specifically calls for archivists to recognize that Indigenous communities have primary rights to materials by or about them. PNAAM is also situated within the framework of heritage ethics, which is concerned with questions about the distribution of power among cultural groups and the “the role that colonial dynamics have played in establishing current patterns of

²⁶ Dow, *Archivists, Collectors, Dealers, and Replevin*; Danielson, “Archives and the Ethics of Replevin”; MacNeil, *Without Consent*; Behrnd-Klodt and Prom, *Rights in the Digital Era*; Windon and Tang, “Archival Discretion”; Jimerson, “Archives for All”; Punzalan and Caswell, “Critical Directions for Archival Approaches to Social Justice”; Hughes-Watkins, “Moving Toward a Reparative Archive”; Dingwall, “Trusting Archivists”; Jimerson, “Ethical Concerns for Archivists”; Greene, “The Power of Archives”; Manžuch, “Ethical Issues in Digitization of Cultural Heritage”; Jules, Summers, and Mitchell, “Ethical Considerations for Archiving Social Media Content.”

²⁷ Adetayo, “Examining the Ethical Dilemmas of Political Impartiality in Records Administration”; LeClere, “The Ethics of Building Digital Archives of the Recent Past”; Davy, “When Good Archivists Go Bad.”

²⁸ Adetayo, “Examining the Ethical Dilemmas of Political Impartiality in Records Administration,” 142. According to Adetayo, phronesis is the ability to make informed ethical judgments in complex practical situations wherein the individual must adapt what they know and believe to the messy circumstances at hand.

²⁹ LeClere, “The Ethics of Building Digital Archives of the Recent Past,” sec. 5.3.1.

³⁰ Davy, “When Good Archivists Go Bad,” 13.

³¹ Gert and Gert, “The Definition of Morality.”

access to, and control over, cultural heritage.”³² Within the archives profession, professional guidelines for moral behavior exist in the form of codes of ethics, but some of these contradict PNAAM in terms of their calls for openness and equal access to or control of materials.³³ Notably, the code of ethics for the Rare Books and Manuscript Section within the Association of College and Research Libraries Division of the American Library Association repeatedly calls for wide access but makes only minimal mention of privacy or sensitivity concerns and does not acknowledge anywhere in the code the power differentials related to collection control.³⁴ In contrast, the 2020 code of ethics from the SAA addresses the need to respect “cultural protections.” The 2005 version, which was in place when PNAAM was developed, also refers to the need to provide access in accord with “cultural sensitivities.”³⁵ The CARE Principles (Collective Benefit, Authority to Control, Responsibility, and Ethics) for Indigenous Data Governance provide guidance for protecting Indigenous rights in Indigenous data and traditional knowledge.³⁶ The authority to control and ethics components within CARE have the most resonance with archivists’ professional codes of ethics.

It is clear that the archives profession does have guidelines for moral conduct. However, whether such guidelines result in moral behavior is dependent on individual actors. Moral disengagement is the process whereby self-regulation of the morality of conduct is selectively suspended. Albert Bandura articulated this concept through a four-part framework: reconstructing one’s conduct, disregarding or minimizing consequences, obscuring or denying one’s agency, and blaming or devaluing those who would be harmed.³⁷ Reconstructing one’s own conduct can involve things like comparing oneself in a favorable light to something more egregious—“At least I’m not doing X”—or by using euphemisms in internal and external rhetoric to reframe the conduct as less significant than it is. Disregarding consequences involves ignoring the outcomes of behavior—such as doing overly narrow assessments or data gathering of, selectively not paying attention to, or deciding there is not enough time to consider harms or potential harms. Obscuring or denying one’s agency involves displacing responsibility onto others or intentionally diffusing responsibility to avoid blame. In archives and library practice, this may take the form of reliance on committees to make decisions that are actually the responsibility of individuals, or referring to an agentless and unchangeable policy when the individuals themselves wrote the policy. Of note, the professional archives codes of ethics listed above, excepting CARE, do not attribute authorship to the individuals who worked on developing the codes. Blaming or devaluing those who would be harmed can include decrying groups of people or individuals as “too sensitive” or unreasonable when such critiques are unwarranted. Or it might appear as overt annoyance, or be classified as inconvenient, that the needs of any particular person or group in the minority must be considered.

³² Matthes, “The Ethics of Cultural Heritage.”

³³ “Our Values: Code of Ethics”; Rare Books and Manuscripts Section Executive Committee and Association of College and Research Libraries Board of Directors, “ACRL Code of Ethics for Special Collections Librarians”; Society of American Archivists Council, “Code of Ethics for Archivists.”

³⁴ Rare Books and Manuscripts Section Executive Committee and Association of College and Research Libraries Board of Directors, “ACRL Code of Ethics for Special Collections Librarians.”

³⁵ Society of American Archivists Council, “Code of Ethics for Archivists.”

³⁶ Carroll et al., “CARE Principles for Indigenous Data Governance.”

³⁷ Bandura, *Social Foundations of Thought and Action*; Bandura, “Social Cognitive Theory of Moral Thought and Action.”

Feelings can influence our behavior and so have an impact on moral decision-making. Feelings related to moral behavior are termed “moral emotion.”³⁸ Moral distress is a state in which moral emotion can arise. Tom Koch described moral distress as “the queasy, inchoate feeling” that arises when “every choice is bad and the only choice is between bad and worse.”³⁹ Moral distress is widely discussed in nursing literature but does not appear in archives literature.⁴⁰ Rachel Imboden critiqued the concept of moral distress as too narrow and instead proposed a model of moral emotion that attempts to better explicate the causes and interrelatedness of emotion, capacity, and context. Imboden’s model of moral emotion identifies a model scenario (the context of the behavior or decision) and the worker’s internal and external capacity as key to the ability for the worker to process complex moral scenarios. Contributing factors to worker capacity in this model include the support of other people, available resources, personal capacity, and coping.⁴¹ Significantly for this study, her model also accounts for other influences on practice, such as professional societies and sociopolitical contexts.

Staffing is an ongoing and well-established need for most archives. The A*CENSUS II survey reported that only 82 percent of archives represented by respondents were staffed with permanent employees. Further, 63 percent of archives represented in the survey had no more than three staff.⁴² Similarly, nearly 44 percent of A*CENSUS II respondents who were not administrators reported having less than five hundred dollars in financial support for professional development.⁴³ Imboden’s model also accounts for the work of professional societies and accrediting bodies as having an influence on moral emotion. In Imboden’s model, one of the necessary aspects of being able to work through moral challenges is the availability of support from other people as well as resources. Understaffing and low funding are therefore moral issues.

Method

The aim of this study is to investigate the following research questions: why individual archivists or memory workers might or might not want to implement PNAAM (RQ1), what factors have supported the implementation of PNAAM at archives (RQ2), and how and why are new ethical standards in general accepted or rejected by archivists and archives (RQ3).

RQ1 is about belief, feelings, or opinions, and was measured primarily with rating scale questions and inferences derived from the correlation of multiple answers. RQ2 was also measured primarily with a rating scale. The researcher hypothesized that supporting factors would include the availability of resources, a sense of personal authority or autonomy, relationships with those knowledgeable, and personal skills. RQ3 is addressed through analysis of RQ1 and RQ2 using moral conduct concepts.

The researcher deemed a survey as a suitable method of inquiry enabling anonymity of respondents, which would presumably increase the likelihood of authentic responses. The study

³⁸ Imboden, “Moving from Moral Distress to Moral Emotion,” 94.

³⁹ Koch, “Moral Stress, Distress, and Injury,” 2.

⁴⁰ Jameton, “A Reflection on Moral Distress in Nursing.”

⁴¹ Imboden, “Moving from Moral Distress to Moral Emotion,” 94.

⁴² Skinner, “A*CENSUS II: Archives Administrators Survey,” fig. 4.

⁴³ Skinner and Hulbert, “A*CENSUS II: All Archivists Survey Report,” fig. 133.

recruited archivists and memory workers at non-Tribal institutions within the United States. Archivists in non-Tribal archives were selected for this study as the SAA's process of endorsing PNAAM revealed concerns about the impacts of PNAAM on non-Tribal archives and non-Indigenous researchers.⁴⁴ The language of "archivist" and "memory worker" used to describe the targeted population was identical to that used in A*CENSUS II, a profession-wide survey aimed at self-identified archivists.⁴⁵ Similarly, the survey used the language listed in A*CENSUS II for repository types. Archivists and memory workers with all perspectives on PNAAM, all lengths of time in field, and all kinds of working experiences were encouraged to participate. The survey consisted of sixteen questions, three of which were yes/no screening questions. Respondents were included only if they currently worked as an archivist or memory worker, if they worked in a non-Tribal setting, and if they worked at a repository with any collections with content by or about Indigenous people. The remainder of the survey was divided between single-select questions, long-text response options, multi-select, and rating scale questions. See appendix 1 for the survey instrument.

The researcher designed, managed, and dispersed the study through Qualtrics software. Participation was solicited from the Western Archives and Archivists listserv, the Conference of Intermountain Archivists listserv, and the Midwest Archives Conference. Other regional listservs, such as the Mid-Atlantic Regional Archives Conference, were considered but were not accessible to the researcher as a nonmember of these organizations. To counteract the regional bias, the researcher also contacted the following SAA sections: Native American Archives; College and University Archives; Archives Management; Research Libraries; Collection Management; Privacy and Confidentiality; and Reference, Access and Outreach. Solicitations were sent out twice to most listservs at a four-week interval in March and April 2023.

Prior to launch, the researcher constructed a variable map to conceptualize the measurement and interaction of questions and variables. Demographic variables were based on A*CENSUS II and were measured by single-select questions. The remaining variables pertain either to the respondent or to an element that is supportive of PNAAM implementation. Some variables have relationships with each other, and so the match between each pair can be used to assess survey validity. See appendix 2.

Results

Fifty-one responses were recorded in Qualtrics—thirty-five were filled out completely and comprise the set used for descriptive statistical analysis. Of the sixteen that were excluded entirely, six were excluded by the screening questions and the remainder were incomplete.

PNAAM in the respondent's own work.

The survey asked respondents to differentiate between their repository's interest or experience with PNAAM versus PNAAM in relationship to their own work as individuals. Overall, respondents indicated awareness of PNAAM prior to the start of the survey (Q4), with nineteen (54%) citing some knowledge and fourteen (40%) stating they were "very familiar." Two had not

⁴⁴ Boles, George-Shongo, and Weideman, "Report."

⁴⁵ Society of American Archivists and Ithaka S+R, "A*CENSUS II All Archivists Survey."

heard of PNAAM prior to the survey, but both respondents expressed interest in implementing at least one aspect of PNAAM going forward. When asked about personal interest in implementing PNAAM (Q5), all but one respondent expressed interest in doing so, with the remaining split evenly between already implementing at least one aspect of PNAAM and indicating interest. One respondent was not currently implementing PNAAM and had no interest in doing so in the future.

Personal reasons for implementing PNAAM. Q6 was a three-part rating scale addressing aspects of why or why not an archivist would personally be interested in implementing PNAAM in their own work. Sub-questions were presented in random order (table 1). Percentages indicate the ratio of people who answered with the indicated statement out of all answers to that particular sub-question.

Question	True	Partially True	Not True	Total
6a. Following SAA recommendations is important to my work.	24 (69%)	10 (29%)	1 (3%)	35
6b. I believe PNAAM is the right thing to do.	31 (89%)	2 (6%)	1 (3%)	34
6c. PNAAM is not fair.	0 (0%)	1 (3%)	33 (94%)	34
6d. PNAAM is not neutral.	12 (34%)	16 (46%)	6 (17%)	34
6e. I worry about researcher's intellectual freedom.	2 (6%)	16 (46%)	17 (49%)	35
6f. I don't think PNAAM is important for this archives.	1 (3%)	2 (6%)	32 (91%)	35
6g. No one (internally or externally) has asked me to implement this.	19 (54%)	4 (11%)	12 (34%)	35
6h. I am uncomfortable reaching out to multiple and/or external communities.	15 (43%)	16 (46%)	4 (11%)	35
6i. Implementing PNAAM helps (or would help) me know more about our collections.	25 (71%)	9 (26%)	1 (3%)	35
6j. My administration or Board of Trustees is or would be supportive of PNAAM.	19 (54%)	12 (34%)	4 (11%)	35
6k. I do not know how to begin the process of implementation.	10 (29%)	9 (26%)	16 (46%)	35
6l. I would need to learn something new to implement PNAAM.	10 (29%)	15 (43%)	10 (29%)	35

6m. I do not have a relationship with the relevant Indigenous communities or nations.	14 (40%)	16 (46%)	5 (14%)	35
6n. I do not have the cultural knowledge or qualifications to do this work.	4 (11%)	23 (66%)	8 (23%)	35
6o. I do not have enough time to work on this project.	5 (14%)	16 (46%)	14 (40%)	35

Table 1. Question 6 Responses

Participation in Q6 was high, with responses rates ranging from 97 to 100 percent. The majority of respondents believe PNAAM is the right thing to do (Q6b), despite limited cultural knowledge (Q6n), lacking strong relationships with the relevant Indigenous communities (Q6m), and personal discomfort with reaching out to external communities (Q6h).

Personal reasons in the free-text responses. Free-text answers in Q7 (“Is there anything else you would like the researcher to know about why you might or might not want to implement PNAAM in your own work?”) indicate several factors that hinder PNAAM implementation: workload, personal or institutional relationships with Indigenous communities, and financial or administrative barriers. Time pressure and workload were present in several responses—whether that be inability to work consistently toward implementation or lack of time to work with existing collections or the backlog. One respondent summarized this concern as, “My main issue is time. I barely have enough time to process new materials, let alone reprocess an older collection.” Relationships with Tribes and Indigenous communities was another theme in the free-text responses, with three respondents noting they did not feel confident they could identify either the appropriate Tribe or the appropriate individual with whom to build a relationship. Two respondents stated they had attempted to initiate relationships with Indigenous communities without success. Funding and administrative issues came up in six of the thirteen free-text responses, all but one of which pointed to barriers related to administration or funding. Due to a lack of funding for permanent staff or reliance on project-funded positions, two respondents indicated that it was difficult for them to work toward PNAAM on more than an ad-hoc basis. A third observed that PNAAM requires slow relationship building and long-term engagement, which may be incompatible with how an organization measures the performance of its employees. Two other respondents mentioned legal or policy barriers that prevented them from implementing part of PNAAM within their state or organization. One respondent had a very different experience: their institution endorsed PNAAM officially and consequently they felt supported in professional development or other work towards PNAAM.

Personal agency. The researcher hypothesized that how PNAAM was experienced in relation to one’s own work could have a correlation to the amount of agency a worker held. Q8 repeated language used in the A*CENSUS II survey to describe position types.⁴⁶ The majority of respondents were individual contributors (i.e., not managers or senior leaders) (sixteen, 45%) with the remaining 55 percent split between managers (ten, 29%) and senior leadership (nine, 26%).

⁴⁶ Society of American Archivists and Ithaka S+R, “A*CENSUS II All Archivists Survey.”

Answers to Q6 did not vary greatly across the three role types, but there were points of divergence in sub-questions 6d, 6e, 6l, and 6n (fig. 1).

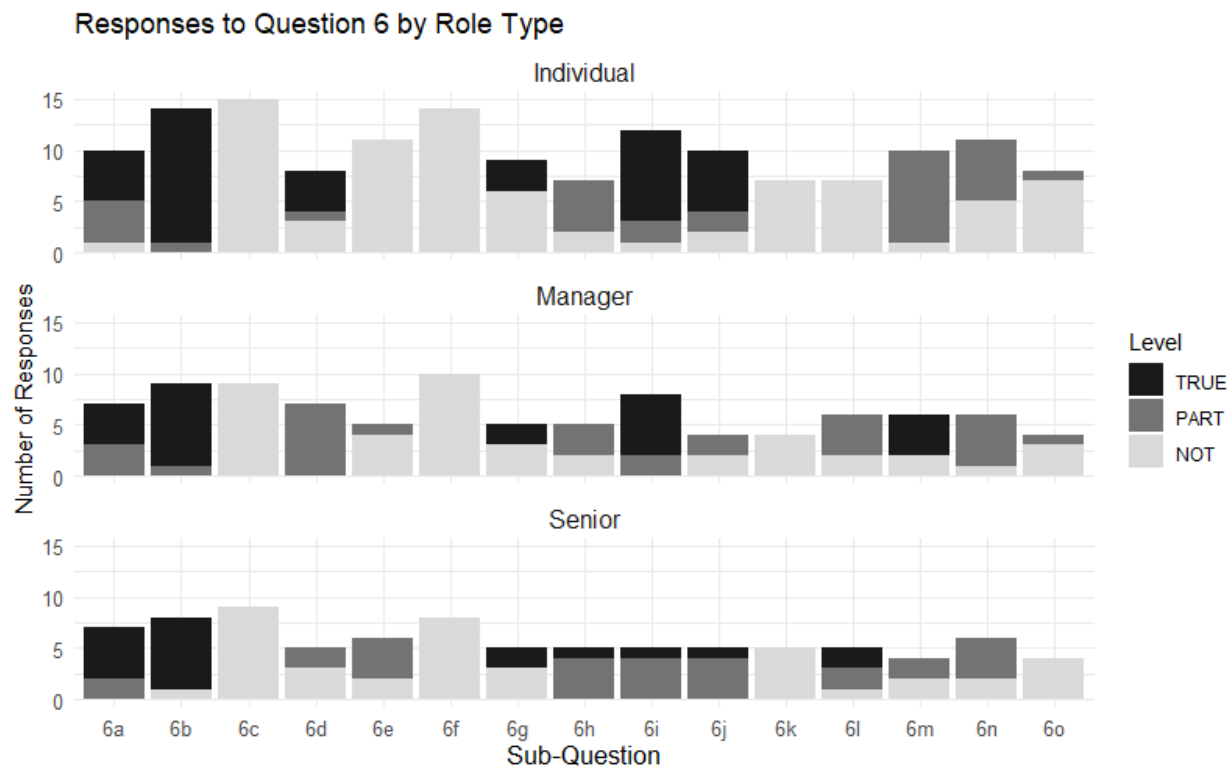


Figure 1. Responses to Question Six by Role Type

Q6d (“PNAAM is not neutral”) asked about PNAAM’s neutrality. Half of individual contributors generally identified the statement as true, but most managers and senior leaders expressed ambivalence by identifying the statement as partially true rather than true or not true. Q6e (“I worry about researcher’s intellectual freedom”) differed in that individuals mostly marked this as not true, while managers and senior leaders were most likely to mark this as partially true. Senior leaders’ ratings for Q6l (“I or other staff would need to learn something new to implement PNAAM”) differed from both individuals and managers. Senior leaders were more likely to feel that they would need to learn something new compared to individuals and managers, while individuals were most likely to feel that they already had the requisite knowledge compared to managers and senior leaders. Answers to Q6n (“I do not have the cultural knowledge or qualifications to do this work”) demonstrated a greater sense of expertise among individual contributors than either managers or senior leaders. About a third of individual contributors disagreed with this statement compared to managers (10%) and senior leaders (22%).

PNAAM in the work of the repository.

Q9 asked the respondent to indicate if the repository where they work is engaged in implementing PNAAM. About half of the repositories were already implementing PNAAM (seventeen, 49%), another seventeen were not but had interest (49%), and one repository was not already implementing or interested in doing so.

How repositories began the work of implementation. Q10 (“How did your repository begin implementing PNAAM?”) was presented to the sixteen respondents who said their repository was already implementing PNAAM. The free-text answers to this question indicate several clusters of action. Five respondents indicated their repository was doing finding aid and processing work as part of PNAAM, with three of those indicating that auditing their own collections was the first step they took in implementation. Others began with relationships. One respondent mentioned using an advisory board, while four others described their institution as having a longstanding sustained practice of working with Indigenous communities. Four repositories had digitally or physically returned items to Indigenous communities, and four had restricted culturally sensitive items. Some respondents also provided information about why their repository had started this work. Three respondents were influenced by external factors—two had prior knowledge of NAGPRA and another noted conversations in the field about social justice as an impetus for implementing PNAAM. One respondent shared that two colleagues in their repository learned about PNAAM in graduate school and so were already familiar with it.

Repositories’ reasons for implementing PNAAM. Q11 was a three-part rating scale addressing the factors that might impact a repository’s ability or interest in implementing PNAAM. Sub-questions were presented in random order. Percentages indicate the ratio of people who answered with the indicated statement out of all people who answered that particular sub-question (table 2).

Question	Applies	Partially Applies	Does Not Apply	Total
11a. We were asked to implement it by a supervisor, administration, or board.	3 (9%)	8 (23%)	24 (69%)	35
11b. We have the necessary relationships with Indigenous communities and nations.	5 (16%)	20 (63%)	7 (22%)	32
11c. We received, or would receive, funding for the labor, travel expenses, or supplies needed for this work.	15 (47%)	10 (31%)	7 (22%)	32
11d. My organization provides training or funding for learning the skills we need to do this work.	16 (50%)	10 (31%)	6 (19%)	32
11e. We have prior or current experience with this kind of work that informed our decision to implement or not.	20 (61%)	7 (21%)	6 (18%)	33
11f. More than one of us is, or would be, working on implementation.	10 (42%)	7 (29%)	7 (29%)	24
11g. PNAAM does not align with our other practices.	10 (42%)	6 (25%)	8 (33%)	24

11h. I do not have colleagues at other institutions who I can call on for help.	7 (30%)	6 (26%)	9 (39%)	22
11i. My repository has enough staff to work on this project.	7 (23%)	7 (23%)	17 (55%)	31
11j. We are, or would be, asked to implement it by someone outside the organization.	6 (19%)	8 (26%)	17 (55%)	31
11k. I, or my coworkers, are comfortable doing equity, diversity, and inclusion work.	6 (17%)	9 (26%)	20 (57%)	35

Table 2. Responses to Question 11

Participation in Q11 was high, with response rates ranging from 91 to 100 percent. Most respondents indicated that their repositories provided at least some funding (Q11c) or professional development support (Q11d) which could be useful for this work although most people believed they or their coworkers collectively only partially had the necessary relationships (Q11b) and overall did not have the comfort level (Q11k) to do the work. The majority reported that they did not face either administrative pressure (Q11a) or external pressure (Q11j) to implement PNAAM, although about half felt that PNAAM aligned at least partially with the repository’s other practices (Q11g). A large portion of respondents thought it likely that more than one staff person would (or is) needed to work on PNAAM (Q11f), but less than a quarter of respondents felt confident they had enough staff to do this work (Q11i).

Repository reasons in the free-text responses. The thirteen free-text answers to Q12 reveal that the most common positive drivers of implementation are that it is perceived as moral or ethical work (three respondents) and that PNAAM implementation serves a practical purpose such as enhancing knowledge of collections (two respondents). The most common barriers to implementation involved lack of time to do the work (two respondents) and problematic staff and leadership (three respondents). Two of these respondents observed that coworkers or administrators had outdated ways of thinking about ownership. One respondent noted that administrators do not actually approve of the time and effort needed to follow PNAAM despite verbalizing support.

Repository Types. The researcher hypothesized that factors influencing PNAAM implementation might have a correlation with repository type (fig. 2). Q13 repeated language used in the A*CENSUS II survey to describe repository types. Only three repository types were represented in the data set: academic institution (seventeen, 49%), government agency (two, 6%), and nonprofit organization (eight, 23%). In contrast to A*CENSUS II, this survey had a high proportion of academic institution responses (49% compared to 34%) and a low proportion of government responses (6% compared to 25%).⁴⁷ Responses to Q11 differed somewhat based on repository type, with academic repositories being the only repositories for which there were at least some “yes/applies” answers to every sub-question.

⁴⁷ Society of American Archivists and Ithaka S+R, “A*CENSUS II All Archivists Survey.”

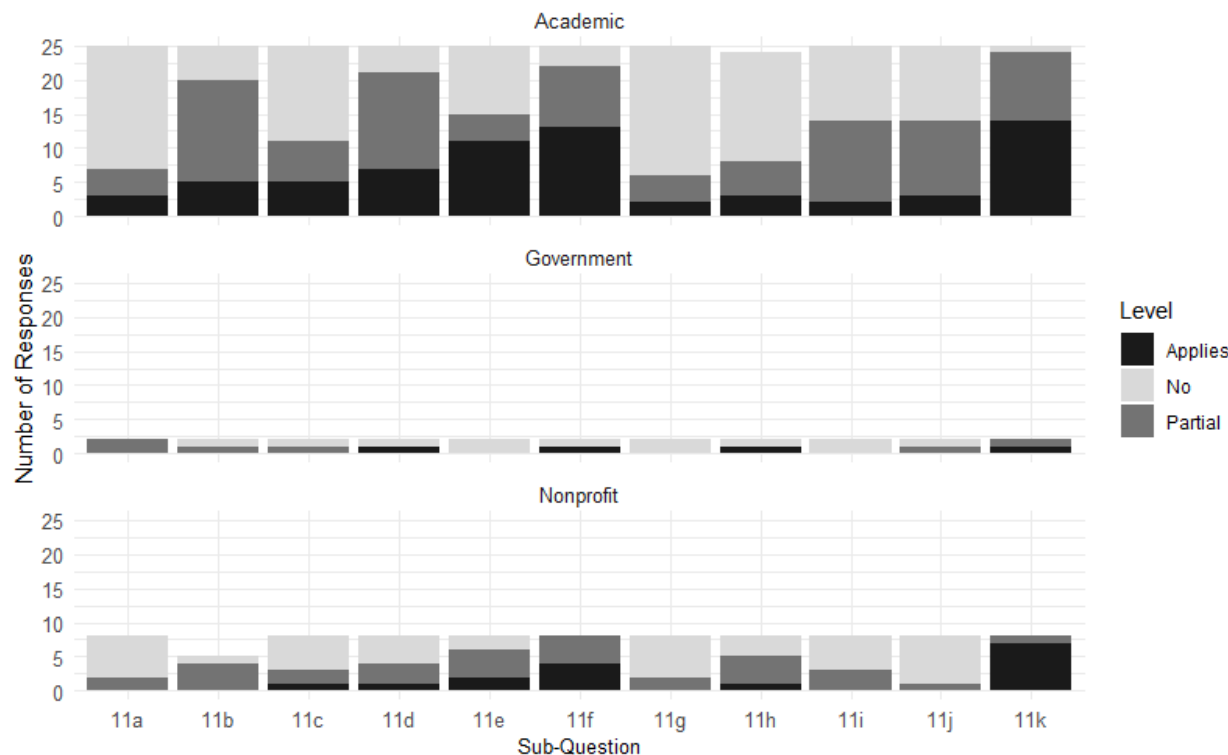


Figure 2. Responses to Question 11 by Institution Type

Three (12%) academic repository responses indicated that the archivist or their repository was instructed to implement PNAAM by a supervisor, administrator, or board (Q11a). Respondents from both nonprofit and government repositories indicated that this partially applied to them, but neither indicated that the statement completely applied. In response to Q11b (“We have the necessary relationships with Indigenous communities and nations”), academic repository responses generally indicated applicability or partial applicability of the statement whereas nonprofit institution responses primarily indicated only partial applicability of the statement. Government repository responses were evenly split between partial applicability and does not apply. PNAAM does not align completely with existing practices (Q11g) for a quarter of academic and nonprofit institutions but does fully align for the two government repositories represented in the survey. Responses to the question of staffing levels (Q11i, “My repository has enough staff to work on this project”) indicate that academic repositories are more appropriately staffed for this work than either government or nonprofit repositories. The final point of divergence is Q11k in which nonprofit organizations were most likely to indicate they did not experience external pressure to implement PNAAM compared to academic and government.

Final thoughts from participants.

The remainder of the survey addressed context for PNAAM. Q14 was a final free-text question inviting respondents to share any last thoughts about PNAAM. Only three responses were received: one noted that PNAAM was a “helpful and easy to understand document,” one noted that their repository was not valued by the administration and so would be unlikely to succeed in

PNAAM efforts due to lack of support and funding, and the final noted that the university system was “not DEI friendly.”

Q15 was designed to understand respondents’ awareness of concepts, roles, and guidelines associated with Indigenous rights, sovereignty, and justice. It asked respondents to indicate if they had “heard of,” “not heard of,” or were “unsure” about each of the following: National Native American Boarding School Healing Coalition (NNABSHC), United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), Native American Graves Protection and Repatriation Act (NAGPRA), Tribal Historic Preservation Offices/Officers (THPOs), Traditional Knowledge (TK), and Indigenous data sovereignty (IDS; table 3).⁴⁸

	NNABSHC	UNDRIP	NAGPRA	THPOs	TK	IDS
Aware of	24 (69%)	27 (77%)	32 (91%)	27 (77%)	31 (89%)	26 (74%)
Unsure	4 (11%)	3 (9%)	3 (9%)	4 (11%)	1 (3%)	5 (14%)
Not aware of	7 (20%)	5 (14%)	0 (0%)	4 (11%)	3 (9%)	4 (11%)
Total	35	35	35	35	35	35

Table 3. Responses to Question Fifteen

Most respondents were aware of all of the above, with NAGPRA and TK being the most commonly known. NNABSHC was the least known with seven respondents (20%) indicating they had no awareness of this.

The final question, Q16, asked respondents to indicate how they had learned about the survey. The SAA Native American Archives Section listserv was cited by thirteen respondents (37%) as the source, with other SAA sections forming the bulk of other sources of recruitment. Despite the regional bias of the individual listservs included in the distribution, the majority of participants were recruited from national sources.

Discussion

The researcher assessed internal survey validity and looked for themes emerging from the data.

Analysis of variables.

The variables associated with individual respondents were measured for the respondent’s association of PNAAM as having some relationship to authorities the respondent follows or rejects

⁴⁸ Indigenous data sovereignty can be defined as the “inherent and inalienable rights and interests of Indigenous peoples relating to the collection, ownership, and application of data about their people, lifeways, and territories.” Kukutai and Taylor, “Data Sovereignty for Indigenous Peoples,” 2. The researcher regrets the use of ableist language in question 15 and next time will use “aware of” instead of “heard of.” This problematic wording appears again in question 16.

(Archivist-Authority), morals and ethics (Archivist-Moral), the relationships the respondent has with others (Archivist-Relationships), the resources available to the respondent for PNAAM work (Archivist-Resources), and the skills (Archivist-Skills) and knowledge (Archivist-Knowledge) the respondent may draw on in PNAAM work. The questions were worded to mitigate the researcher's bias in favor of PNAAM, by using both positive, neutral, and negative statements about PNAAM or factors likely to be associated with PNAAM implementation. Consequently, agreement with a statement cannot always be measured as a positive association between a variable and PNAAM implementation.

Authority. The majority of respondents indicated they did not receive a directive to implement PNAAM by a supervisor or administrator. Q6a (following SAA recommendations), Q6g (external pressure directed at the respondent), and Q6j (board or administration support for PNAAM) measure the Archivist-Authority variable. The majority of respondents indicated observation of SAA guidelines such as PNAAM (Q6a), as well as administrative support (Q6j), but also indicated by a slight majority (Q6g) that no one had asked them to implement PNAAM. The related repository-centric variable, Supporting Factor-Authority, was measured with Q11a (administrative directive) (see appendix 2 for variable dyads). These answers indicate that respondents perceive professional authorities, in the form of administrators and professional guidelines, as generally being supportive of PNAAM but that authorities have not actually asked for PNAAM work.

Morality. Most respondents indicate that PNAAM is not neutral or partially not neutral. Responses to Q6b (PNAAM is the right thing to do), Q6c (PNAAM is not fair), Q6d (PNAAM is not neutral), and Q6e (worry about intellectual freedom) can be used to evaluate perceptions of PNAAM as having an ethical or moral component (Archivist-Moral). The researcher intended Q6c and Q6d to read as neutral to the question of PNAAM's morality. The majority of respondents who indicated that PNAAM is the right thing to do (Q6b) also indicated that PNAAM is fair (Q6c). These results indicate that survey respondents do not think something has to be neutral to be fair or right. However, rightness and fairness do seem to correlate. As discussed earlier, concern about intellectual freedom differed between respondents with management or leadership roles and those that were individual workers.

Relationships. Archivist-Relationships was measured in Q6h ("I am uncomfortable reaching out to multiple and/or external communities") and Q6m ("I do not have a relationship with the relevant Indigenous communities or nations"). These two statements seem correlated in the survey responses. A majority of respondents indicated some degree of discomfort with reaching out to communities and indicated they do not have a relationship with the relevant Indigenous communities or nations. The related repository variable, Supporting Factor-Relationships, was measured in Q11b ("We have the necessary relationships with Indigenous communities"), Q11f ("More than one of us is, or would be, working on implementation"), Q11h ("I do not have colleagues at other institutions who I can call on for help"), and Q11j ("We are, or would be, asked to implement it by someone outside the organization"). Q11b and Q6m aligned closely with most respondents choosing "partially applies" in each case. In contrast, Q11h and Q6h diverged with about a third of respondents indicating discomfort with reaching out to communities while also indicating that they had colleagues they could reach out to for help, selecting "true" for Q6h and "does not apply" for Q11h. The question does not define "colleagues at other institutions" or "Indigenous communities" so either category could include archivists and memory workers

working for a Tribe. Given that about a third of respondents feel they have colleagues they could ask but are also uncomfortable reaching out to Indigenous communities, these findings could indicate that respondents feel more comfortable reaching out to other non-Tribal archives archivists or memory workers rather than Tribal archivists or memory workers. Alternately, the interaction of these two questions could mean that archivists lack awareness that Tribes may have their own archivists or memory workers.

Resources. The resources variables were measured in Q6o (“I do not have enough time to work on this project”), Q11c (“I, or my repository, received funding for this work”), Q11d (“My organization provides training or funding for learning the skills I need to do this work”), and Q11i (“My repository has enough staff to work on this project”). Q6o and Q11i both measure staff time. The largest segment of respondents, about a third, indicated that their repository does not have enough staff and that they only partially have enough time themselves to do this work. A quarter of respondents indicated that they themselves have enough time but that their repository only partly has enough staff. If Q6o and Q11o were calibrated correctly, respondents would most likely indicate they either do not have enough time and their repository needs more staff, or they would indicate that they have enough time and their repository has enough staff. The discrepancy may indicate that the use of combined positive and negative question statements resulted in confusion for respondents.

Research question findings.

Respondents demonstrated interest in implementing PNAAM and/or a clear assessment of PNAAM as a good approach. Speaking to RQ1 (“why individual archivists or memory workers might or might not want to implement PNAAM”), most respondents believe PNAAM implementation is good for moral, ethical, and practical reasons. One respondent described moral and ethical reasons as “PNAAM enables archivists to take a people-first approach to archives,” while another simply stated, “Our primary influence is that it is the moral and ethical thing to do.” Several respondents mentioned a relationship between PNAAM and better understanding a repository’s collections. One respondent summed this up as, “One of the biggest drivers for further implementation was entirely practical: it was manifestly good for the repository to understand and steward its collections more effectively.” PNAAM also exists as part of the general landscape of professional practice for many respondents. As demonstrated by Q15, respondents are highly aware of related efforts, concepts, and guidelines. Several respondents indicated in the free-text questions that they had working experience with NAGPRA, and one respondent specifically mentioned learning about PNAAM in graduate coursework.

The study exposed several barriers to implementation that contribute to an understanding of RQ2 (factors that support implementation). Discomfort, lack of relationships, limited knowledge, and limited staffing are primary barriers, more so than limited funding, disagreement with PNAAM, or opposition from administration. Discomfort is an important finding as it correlates to Imboden’s model of moral emotion in which personal coping and capacity play a role in the ability to work through moral challenges.⁴⁹ Some discomfort with reaching out to communities was a factor for 91 percent of respondents (Q6h). A high number of respondents (86%) also indicated a lack of relationships with Indigenous communities to some degree (Q6m). Taken together, these results

⁴⁹ Imboden, “Moving from Moral Distress to Moral Emotion.”

indicate that the profession may not succeed at PNAAM implementation until it can improve cross-cultural communication skills and/or offer practice with overcoming identity-based discomfort as part of graduate or continuing education. Toleration of discomfort is an important element of critical practice.⁵⁰ Respondents also indicated a lack of cultural knowledge (Q6n), but cultural knowledge may be community- or nation-specific and so is less likely to be something that can be addressed in graduate or generalized professional development programs. Limited staffing is an unsurprising finding and one that applies to almost all archival work. The significance here is that staffing limitations reinforce the perpetuation of past practices rather than ensuring a repository has flexibility to try new ways of doing things. Based on these findings, the top two factors supporting PNAAM implementation are increased comfort with cross-cultural work and suitable levels of staffing.

RQ3 (how and why new ethical standards in general are accepted or rejected) is not directly answerable by the data collected in the study, but the results do map somewhat to Imboden's moral emotion model. The intent was to use moral disengagement concepts to analyze the data and findings for RQ1 and RQ2. The researcher examined the free-text portions of the survey results through Bandura's four-part framework for moral disengagement.⁵¹ The survey respondents demonstrated very little evidence of moral disengagement. No one attempted to reconstruct their own conduct by using euphemisms or comparing their conduct to something worse. Disregarding or minimizing consequences was somewhat apparent in several of the responses, specifically the idea that there was not enough time or people to evaluate or address harms related to non-Tribal stewardship of Indigenous materials. However, the survey respondents who brought up time constraints presented them as a factual obstacle rather than an excuse for avoiding PNAAM work. In terms of denying or obscuring agency, there was no significant difference among leaders, managers, and individual contributors in terms of their positive or negative views of PNAAM despite all three roles embodying different degrees of workplace agency. All but three respondents indicated full support of PNAAM, with two indicating partial support and one asserting that PNAAM was not the right thing to do (Q6b), and each of these represented a different role type. However, none of the free-text answers for these respondents or others indicated any attempt to deny agency. There was also no overt blaming or devaluing of Indigenous communities. Since moral disengagement was not evident, the researcher can draw no conclusion on what role moral disengagement may play in adopting new critical practices in archival work. However, the study does indicate that desire to begin following a new ethical standard is insufficient; the archivist or repository must also have sufficiently low barriers in other aspects as well.

Several minor findings also emerged from the data. First, there is some evidence that SAA may be less influential than is expected based on stated interest in following endorsed standards or recommendations. The majority of respondents indicated some interest in following SAA recommendations (Q6a). At the same time, a majority of respondents indicated that no one (internally or externally) had asked for PNAAM implementation (Q6g). This finding indicates that SAA recommendations, such as the endorsement of PNAAM as a professional standard, may not be perceived as providing pressure to change practice, even if practitioners generally desire to follow SAA recommendations.

⁵⁰ Caswell, "Feeling Liberatory Memory Work on the Archival Uses of Joy and Anger."

⁵¹ Bandura, *Social Foundations of Thought and Action*.

Several free-text responses throughout the survey indicate a conception of PNAAM as primarily about collections and how they are processed or described. PNAAM states that its purpose is to provide best practices for “culturally responsive care and use.” In addition to guidelines on collection care and description, PNAAM provides guidance on relationship-building, repatriation, research protocols, and reciprocal education and training. PNAAM is therefore applicable to much more than processing collections.

Finally, individual contributors generally expressed more confidence in self-assessments than senior leaders. Specifically, senior leaders more frequently identified the need to learn something new to implement PNAAM (Q6l), and individual contributors were more likely to indicate they already had the requisite cultural knowledge or qualifications to do the work (Q6n).

Study limitations.

The survey design emphasized both ease of participation and anonymity in part through respondent self-selection and minimal collection of demographic data. As a consequence, there is no way to analyze geographic distribution of respondents or to characterize respondents by age, time in career, or other demographic aspects. The survey is therefore unable to account for approaches to PNAAM work associated with differences in age, race, ethnicity, religion, or region.

The survey design also measured degrees of agreement with both positive and negative statements about PNAAM. The intent in presenting both positive and negative statements was to ensure the survey did not read as biased for or against PNAAM, but using both positive and negative statements may have led to confusion. For example, all but one respondent indicated some amount of agreement with the statement “I believe PNAAM is the right thing to do” (Q6b). However, the respondent who felt that statement was not true, later stated that “the argument for [PNAAM] implementation is not just moral, it’s practical” (Q12). The discrepancy between these two responses may point to a problem with question wording.

The response pool is very limited in size and cannot be assumed to be an accurate indicator of how the broader archival population understands PNAAM or how they experience PNAAM implementation. Statistical information within this study is provided for descriptive, rather than predictive, purposes.

Future Directions and Conclusion

Implementation of a new practice such as PNAAM requires that an archives have more time and/or staff than it does currently, or that it shift how it spends its existing time to create space for the new practice. More time enables education and/or training for non-Indigenous archivists to gain a baseline competency in Indigenous studies and to develop tolerance of discomfort, self-awareness, and the confidence to try new approaches. More time and/or staff also enables archives and archivists to demonstrate trustworthiness to the specific Indigenous communities with whom they need to work, which can lead to the relationships that are essential for PNAAM to function. “More time and/or staff” can also mean sharing or exchanging knowledge with communities and/or future archivists to help ensure archival materials stay with their community of origin in the future. Tactics to get more time include acquiring fewer materials, reducing quality or granularity of work

in other areas, prioritizing PNAAM, working persistently in all areas rather than reacting to only what feels urgent, offering fewer assisted copy services or reducing public hours, or hiring more staff to increase the amount of staff effort available. Further research could assess the impact of changes such as these on the implementation of ethical guidelines such as PNAAM. Further research is also needed to understand implementation of PNAAM in Tribal archives and libraries as this study was focused exclusively on non-Tribal archives.⁵²

Archives are endeavoring to do a great deal, over a long period of time, and with great complexity despite being supported and staffed insufficiently for their workload.⁵³ The profession's trajectory is untenable. In order to implement PNAAM or other critical practices, archives must be amply staffed in light of the scope of their work: instruction, preservation, analysis, technical expertise, relationship-building, and finally provision of space and place for emotional experiencing and cultural production both now and for the future. Society does not staff archives adequately to do their work. If archivists are to prioritize critical practice, they must overcome difficulties such as ever-growing backlogs and reliance on volunteers or narrowly focused short-term employees.⁵⁴ These challenges lead to a well-justified sense of unending urgency. Under such conditions it is unlikely that archivists can develop the comfort level, temporal flexibility, knowledge, and skills to shift to critical praxis as a norm.

There is no easy solution. Many archivists, including most respondents, have opted to work ad hoc on improved practices as time or energy stores permit. Meanwhile archives continue to acquire and build their backlogs in part to rectify the bias of past acquisitions—a solution that serves a purpose but also creates fodder for future rectification efforts. One of the respondents put it thus: “I’ve seen processing—and creating metadata that calls attention to the cultural affiliation of Native American archival materials—as a necessary antecedent for implementing PNAAM. But when does the processing end, and when does PNAAM begin?”

When does routine work end, and when does critical work begin? Based on this study, the primary barrier to implementation of PNAAM, and by extension other critical approaches, is simply the noise and momentum of everyday challenges. Personal discomfort, combined with low staffing and standard practices, and technical or procedural obstacles are the primary culprits. The main barriers are not lack of desire, political or moral disagreement, lack of relevance, opposition from administration, or an insurmountable lack of knowledge. Instead, it is the predominance (and hegemony) of the colonial American archive and its daily technical and organizational entanglements that make it so hard to change.

⁵² The researcher extends her appreciation to the anonymous reviewer who brought this to her attention.

⁵³ Skinner, “A*CENSUS II: Archives Administrators Survey.”

⁵⁴ Skinner, “A*CENSUS II: Archives Administrators Survey,” 14. Findings indicate that 30% of archives have part-time staff, 39% have volunteers, 11% have staff on contracts of less than one year, and 14% have staff on contracts of one to three years. Only 82% have full-time permanent employees.

Appendix 1. Survey Questions

Section 1: Beginning of the Survey

Q1. Are you currently working as an archivist or memory worker in the United States of America?

- Yes
- No

Q2. Do you currently work in a non-Tribal archives or library?

- Yes
- No

Q3. Does your repository have any collections with content by or about Indigenous people?

- Yes
- No

Section 2: Your Own Interest in PNAAM

The Protocols for Native American Materials (PNAAM) are a set of guidelines, or protocols, designed to assist non-Tribal archives in culturally responsive care and use of Indigenous materials held in non-Tribal organizations. The protocols were formally endorsed by the Society of American Archivists as an external standard in 2018. You can learn more about PNAAM at the Native American Archives Section of the Society of American Archivists (SAA).

Q4. Prior to this survey how familiar were you with the Protocols for Native American Archival Materials? Choose the statement that sounds most like you.

- I was not aware of PNAAM prior to this survey.
- I had some knowledge of PNAAM.
- I was very familiar with PNAAM.

Q5. Are you personally interested in implementing PNAAM (fully or partially) in the work you do yourself as an archivist or memory worker?

- I am not interested in implementing PNAAM in my own tasks or activities.
- I am interested in implementing at least one aspect of PNAAM in my own tasks or activities.
- I am already implementing at least one aspect of PNAAM in my own tasks or activities.

Q6. This question asks about reasons you might or might not want to implement PNAAM in your own work that you yourself do. Please select the category that best represents how true the statement is for you.

Statements are randomly ordered.

	True	Partially True	Not True
Following SAA recommendations is important to my work. (6a)			
I believe PNAAM is the right thing to do. (6b)			

PNAAM is not fair. (6c)			
PNAAM is not neutral. (6d)			
I worry about researcher's intellectual freedom. (6e)			
I don't think PNAAM is important for this archives. (6f)			
No one (internally or externally) has asked me to implement PNAAM. (6g)			
I am comfortable reaching out to multiple and/or external communities. (6h)			
I think implementing PNAAM helps (or would help) me know more about our collections. (6i)			
My administration or Board of Trustees is or would be supportive of PNAAM. (6j)			
I do not know how to begin the process of implementation. (6k)			
I would need to learn something new to implement PNAAM. (6l)			
I do not have a relationship with the relevant Indigenous communities or nations. (6m)			
I do not have the cultural knowledge or qualifications to do this work. (6n)			
I do not have enough time to work on PNAAM implementation. (6o)			

Q7. Is there anything else you would like the researcher to know about why you might or might not want to implement PNAAM in your own work? If so, please provide that information here.

Q8. Please select which of the following best describes your current position:

- Individual contributor (not a manager or supervisor)
- Manager or supervisor
- Head of department/director/senior leader

Section 3: Your Repository and PNAAM

Q9. Has your repository implemented, or is in the process of implementing, any portion of PNAAM?

- Yes
- No, but we are interested
- No, and we are not interested

Q10. How did your repository begin implementing PNAAM?

Q11. This question seeks to understand what factors have impacted your repository's ability or interest in implementing PNAAM. Please select the category that best represents how applicable the statement is for your repository.

Statements are randomly ordered.

	Applies	Partially applies	Does not apply
We were asked to implement it by a supervisor, administration, or Board. (11a)			
We have the necessary relationships with Indigenous communities and nations. (11b)			
We received, or would receive, funding for the labor, travel expenses, or supplies needed for this work. (11c)			
My organization provides training or funding for learning the skills we need to do this work. (11d)			
We have prior or current experience with this kind of work that informed our decision to implement or not. (11e)			
More than one of us is, or would be, working on implementation. (11f)			
PNAAM does not align with our other practices. (11g)			
I do not have colleagues at other institutions who I can call on for help. (11h)			
My repository has enough staff to work on this project. (11i)			
We are, or would be, asked to implement it by someone outside the organization. (11j)			
I, or my coworkers, are comfortable doing equity, diversity, and inclusion work. (11k)			

Q12. Is there anything else you would like the researcher to know about factors that have influenced whether or not your repository decided to start implementing PNAAM? If so, please provide that information here.

Q13. Please select which of the following best describes your current employer:

- Academic Institution
- Government agency
- Nonprofit organization
- For-profit organization
- Community archives

Section 4: End of the Survey

Q14. If there is anything else you would like the researcher to know about PNAAM implementation, please provide that information here.

Q15. This question seeks to understand the context of PNAAM for you and your work. Please indicate if you have heard of the following resources, practices, or organizations. Your answers will help the researcher know what other resources, practices, and organizations might influence decisions to implement or not implement PNAAM.

	Heard of	Unsure	Not heard of
National Native American Boarding School Healing Coalition			
United Nations Declaration on the Rights of Indigenous Peoples			
Native American Graves Protection and Repatriation Act (NAGPRA)			
Tribal Historic Preservation Offices/Officers			
Traditional Knowledge			
Indigenous Data Sovereignty			

Q16. Where did you hear about this survey? Please select all that apply. This final question helps the researcher assess, while preserving your anonymity, what association or section listservs had respondents.

- Conference of Intermountain Archivists listserv
- Direct email or forwarded to me
- Midwest Archives Conference
- Society of American Archivists College and University Archives Section
- Society of American Archivists Issues and Advocacy Section
- Society of American Archivists Management Section
- Society of American Archivists Museum Archives Section
- Society of American Archivists Native American Archives Section
- Society of American Archivists Research Library Section
- Western Archives Listserv
- Not sure
- Other

Appendix 2. Variables*Variable Map*

Variable	Definition	Related Survey Questions	Research Question
Demographic-Role	The archivist's role in the workplace. Indicates degree of control over the activities of the unit in which they work.	Q8	Why individual archivists or memory workers might or might not want to implement PNAAM (RQ1) What factors have supported the implementation of PNAAM at archives? (RQ2)
Demographic-Repository Type	The type of repository at which the archivist is employed.	Q13	RQ2 How and why new ethical standards in general are accepted or rejected by archivists and archives (RQ3)
Repository-Support	Indicator of the repository's support for implementing PNAAM	Q9 Q10	RQ2
Archivist-Moral	Indicator that the archivist associates implementing PNAAM with moral behavior	Q6b Q6c Q6d Q6e	RQ1
Repository-Relevance	Indication that the repository has collections for which PNAAM is relevant. This is a screening variable, so all respondents who pass screening are assumed to have relevant collections.	Q6f	RQ2
Archivist-Authority	Directives or guidelines from authorities the archivist uses (or rejects) in relation to PNAAM	Q6a Q6g Q6j	RQ1 RQ3

Archivist-Skills	The archivist's skills (not further defined) that are relevant to PNAAM implementation	Q6n	RQ1 RQ3
Archivist-Knowledge	The knowledge the archivist has about PNAAM or similar work	Q6i Q6k Q6l Q6n Q15a Q15b Q15c Q15e Q15f	RQ1 RQ3
Archivist-Relationships	The relationships the archivist has with others that impact their implementation (or not) of PNAAM	Q6h Q6m	RQ1 RQ3
Archivist-Resources	Resources such as time and funding available to the archivist that have relevance to PNAAM implementation	Q6o	RQ1 RQ3
Archivist-Oppose	Opposition from the archivist to PNAAM or PNAAM implementation	Q5a	RQ1
Archivist-Support	Support from the archivist for PNAAM or PNAAM implementation	Q5b Q5c	RQ1
Supporting Factor-Other	Other factors that support implementation of PNAAM	Q7 Q14	RQ2
Supporting Factor-Resources	Resources such as time or money that help a repository implement PNAAM	Q11c Q11d Q11i	RQ2
Supporting Factor-Authority	Directives or guidelines from authorities the repository receives in relation to PNAAM	Q1a Q11g	RQ2 RQ3
Supporting Factor-Relationships	The relationships repository staff have with others that impact their implementation (or not) of PNAAM	Q11b Q11f Q11h Q11j	RQ2 RQ3
Supporting Factor-Knowledge	The knowledge available or held by repository staff about PNAAM or similar work	Q11d	RQ2 RQ3
Supporting Factor-Skills	Skills held by repository staff (not further defined) that are	Q11d Q11e Q11k	RQ2 RQ3

	relevant to PNAAM implementation		
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Variable Dyads

Archivist Variable	Related variable
PNAAM-Archivist-Authority	Supporting Factor-Authority
PNAAM-Archivist-Skills	Supporting Factor-Skills
PNAAM-Archivist-Knowledge	Supporting Factor-Knowledge
PNAAM-Archivist-Relationships	Supporting Factor-Relationships
PNAAM-Archivist-Resources	Supporting Factor-Resources

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