Academic Senate Board Report
October 14, 2026
Sacramento City College - Host College

Sacramento City College
AS President Amy Strimling

- The Academic Senate passed a resolution titled "Resolution on the Repatriation of Unethically Obtained Human Remains in Anatomical Teaching Collections" as an extension of proposed Board Policy P-7920 on Human Remains.
- We have continued our discussions on the possibility of establishing a Test Proctoring Center.
- Departments have submitted their requests for new faculty hires and we are now working through the rankings process.
- Senate President Amy Strimling attended the ASCCC Fall Area meeting on October 9th along with several faculty colleagues from SCC.

American River College
AS President Dr. Veronica Lopez

- Faculty are working diligently as we look ahead to another hiring season, and we can't wait to welcome a new group of talented, diverse colleagues to our ARC space.
- A big shout-out to our faculty, who are hard at work on their Annual Unit Plans! Grounded in student data and aligned with our strategic plan, these plans chart each department's goals, next steps, and resource needs, all in service to each other and our students.
- As we navigate the Age of AI together, faculty continue to share what support would help them most. This includes local Senate Standing Committees, to guidelines for college employees using AI to do their jobs and what permissions or disclosures are needed.
- Academic Senate continues dialogue around Testing Centers and look forward to guidance from ASCCC.
- The Senate Executive team attended the ASCCC Area A Meeting last Friday and is excited to learn about all the work of the Senate happening across the State.

Cosumnes River College
AS President Lauren Wagner

- The Academic Senate voted to approve changes to our bylaws at the Sept. 25th meeting. A vote by faculty to approve constitution changes has begun with votes due by Oct. 16.
- Senate President Lauren Wagner attended the ASCCC Fall Area Meeting on Oct. 9.
- On Oct. 13th CRC's Academic Senate and LRCFT President hosted the second in our series of joint workshops about the performance review process. This session focused on the faculty observation process.
- Faculty are continuing to work towards a successful hiring season for next year's new faculty with the completion of qualitative statements about their department needs.
- The senate will offer an opportunity for faculty to practice their pitch ahead of the faculty prioritization meeting.

Folsom Lake College
AS President Wayne Jensen

- FLC has begun a process to determine the best use of the space that is being gained by the closure of our bookstore. The process involves all constituency members and will ensure that all constituency members have an opportunity to review and respond to the various repurposing proposals that have been submitted through annual planning processes.
- Academic Senate President, Wayne Jensen, and Vice President, David Lacy, attended the ASCCC Fall Area A Meeting held on October 9th in preparation for the ASCCC Spring Plenary Session taking place early next month. Our Past President, Eric Wada, was also in attendance in his role as ASCCC Secretary.
- The FLC Academic Senate is currently moving through the Faculty Hiring Prioritization Process in anticipation of welcoming many new colleagues next academic year.

District Academic Senate
DAS President Lori Petite

- Congratulations to Sonia Mercado Ortiz on her recent retirement and best wishes for the future. Congratulations and welcome back to Melanie Dixon, Interim AVC of Student Services.
- DAS Decision to Affirm P-7910 NAGPRA Policy & P-7920 Human Remains Policy – After a 2 ½ year multi-constituent process, the draft NAGPRA and Human Remains Policies have been approved by the District Academic Senate. A heartfelt thanks goes to all the members of the task force whose dedication helped to craft these policies in consultation with our local tribal partners--including eight tribes and tribal communities in our region--and meticulously labored over each section. Of special note, both policies include an acknowledgement of past harms, patterned after a similar acknowledgement

from CSUS. May I offer that the acknowledgment of past harms is a vital component in the processes and goals of restorative justice. Restorative justice is not just a correction of future behavior, but a recognition of the past, as experienced by the victims. It is through the authentic acknowledgement of harms that authentic healing can begin. Thank you in advance for your consideration. The full text of the proposed NAGPRA and Human Remains Policies are linked and included at the end of my report.

- Prison and Reentry Education Program (PREP) at Mule Creek State Prison (MCSP) -- Earlier this year, LRCFT suspended the Memorandum of Understanding (MOU) held with our District, at Mule Creek State Prison, citing specific safety concerns. At our last District Academic Senate meeting, we reviewed the Spring 2026 reports from the DAS PREP Committee. As a result of this discussion, which included faculty representation from the DAS PREP committee as well as LRCFT, the senate body directed me to make an urgent appeal to our District administration, requesting that District schedule a meeting with direct participation by Mule Creek State Prison, LRCFT, and LRCCD. A specific request was made that the meeting occurs in sufficient time to preserve the possibility of Spring 2027 instruction. Significant concerns were expressed over many issues, including approximately 400 Los Rios students at MCSP who will lose their catalog rights if they are unable to enroll in classes in the Spring 2027. I recall that at the recent Board retreat, our Board requested follow-up reports on some of our most vulnerable populations, specifically our refugee populations. I respectfully request that our Board explore the situation with a population that is just as vulnerable but much more hidden, our incarcerated students. Education remains the singular intervention that transforms lives inside and outside of prison. Recidivism rates drop dramatically for formerly incarcerated students. Job prospects increase, incomes go up, and lives are transformed through purpose, training, education, and hope. I believe that our district is committed to faithfully serving the communities of our region and supporting the educational welfare of all of those who reside in it. Working together—in collaboration and community--we can find a path forward to serve the Los Rios students of MCSP. I respectfully request our District administration's prompt attention to the concerns raised. Thank you in advance for your consideration.

  Attachments:

  1. Approved NAGPRA Policy & Human Remains Policies
     a. https://docs.google.com/document/d/1i5NlDBNQ9WajFrbVdl9aUjdmicmQX7rUOZ69EW_L-_g/edit?tab=t.0
     b. https://docs.google.com/document/d/1SBIe0LfNlmApxH6mxHQg2BbaivF_Si5j8tmSx8MnRPM/edit?tab=t.0#heading=h.v3l9qrpp5vs

2. DAS PREP Committee Reports & Recommendations - Spring 2026
    a. Summary Report & Recommendations https://drive.google.com/drive/u/2/folders/1XFQZM2_NCGo9nH4QnA2Yg-JphpjkP9Qk
    b. Full Report & Recommendations https://drive.google.com/drive/u/2/folders/1Ox9-RmjfQDR7yWNgzBdEwf2SAAoif2iO

DAS Approved P-7910 NAGPRA Policy

1.0 Purpose and Scope

1.1 This policy establishes a clear process for compliance by Colleges in the Los Rios Community College District with the Native American Graves Protection and Repatriation Act (NAGPRA) (U.S Code, title 25 § 3001 et seq.), the California Native American Graves Protection and Repatriation Act California (CalNAGPRA) (Health & Safety Code (CHSC) §§ 8010-30), and their subsequent regulations and amendments. Additionally, this policy establishes the procedures by which departments will report human remains and cultural items that may be subject to these laws. This policy serves to facilitate the expeditious repatriation of Native American ancestors and cultural items that belong to their lineal descendants, Indian Tribes, and Native Hawaiian Organizations. Terms used in the policy are legally defined by the NAGPRA and the CalNAGPRA and their subsequent regulations, including definitions for “human remains” and “cultural items” (see Appendix A). In deference to and out of respect for Tribes' preferred terminology, this policy uses the term ancestors in place of 'human remains,' except when addressing the legal requirements of the NAGPRA. Departments may develop their own best practices as it relates to the use and care of human remains and cultural items not subject to the NAGPRA or the CalNAGPRA, so long as they do not conflict with the treatment of human remains outlined in this policy. The approval of this policy will mark the end of the moratorium and any materials determined not to be subject to the NAGPRA and the CalNAGPRA will be returned to their respective departmental teaching collections in a timely manner.

1.2 The NAGPRA was enacted by Congress in 1990 to govern the return of Native American ancestors and cultural items to lineal descendants, culturally affiliated Indian Tribes, and Native Hawaiian Organizations. The NAGPRA applies to institutions who receive federal funds, such as Colleges in the District which are designated as ‘museums’ under the law (Code of Federal Regs., title 43 § 10.1). The NAGPRA requires these museums to participate in the repatriation process with federally recognized Tribes.

1.3 In 2001 the California State Legislature passed the CalNAGPRA which requires state agencies and museums that receive state funding and have possession or control over collections of Native American human remains or cultural items to provide a process for the identification and repatriation to the appropriate Tribes (AB 389). The intent of this bill was to facilitate the proactive repatriation of Native American ancestors and cultural items to California Indian Tribes, to require outreach and consultation by state funded agencies and museums in California, provide a process whereby recognized and non-federally recognized California Indian Tribes may seek the assistance for the California Native American Heritage Commission (NAHC) to resolve disputes, establish a meaningful consultation process that respects confidentiality, and to give Tribal traditional knowledge authority with respect to determining cultural affiliation and identification of cultural items so that it is given deferential weight to other lines of evidence (AB 275.1). The CalNAGPRA repatriation practices often work in tandem with federal NAGPRA compliance. The District follows federal NAGPRA repatriation procedures as outlined in Code of Federal Regs., title 43.Tribes without federal recognition can work with federally recognized Tribes as part of a joint request for repatriation under CalNAGPRA (AB 275).

1.4 Jeremiah B. Lillard was the first President of Sacramento Junior College, now Sacramento City College, and served between 1923 and 1940. Lillard almost exclusively excavated Native American burials in California, with a particular focus on the Sacramento area. Lillard removed hundreds of Native American ancestors and cultural items. This collection was housed at Sacramento City College until 1942, when the Sacramento Junior College Museum closed. Afterward, the collection was distributed across multiple institutions, with the vast majority going to University of California, Berkeley. Additionally, John Wells was an educator who worked at the Sacramento Discovery Museum and was an archaeologist who worked in Oregon and Arizona in the 1950s and 1960s. After his passing, family members donated his collection to Sacramento City College. It was later discovered that this collection contained human remains and cultural materials subject to the NAGPRA and the CalNAGPRA. As of 2012, no current District employees were knowingly responsible for obtaining Native American ancestors or cultural items under the District's control.

2.0 Acknowledgement of Past Harms

2.1 On [date], the Chancellor of the Los Rios Community College District released a statement of acknowledgement of past harms. In this address, the District acknowledged that systematic removal and possession of Native American and Native Hawaiian ancestors and cultural items from sites and Tribal communities has caused extensive harm to Tribes and lineal descendants. These harms include the desecration of cemeteries, the prolonged separation of ancestors and cultural items from their communities, the financial, logistical and emotional costs of repatriation, the loss of control of sensitive information regarding Native American ancestors and cultural items, the trauma to descendant communities of students being in the same building or College where their ancestors may be present, and the inability to control

the information that is published about one's own cultural history. The repatriation process itself has also had a history of continuing this trauma because Native American ancestors were not repatriated or returned in a timely or respectful manner. The continued harms to Native communities due to the lack of compliance with the NAGPRA and the CalNAGPRA are the responsibility of the District.

3.0 Guiding Principles

3.1 The District recognizes the harm these actions have caused the Tribes and is committed to repatriation. This policy spotlights the passage of the NAGPRA and CalNAGPRA and their call for human rights, which requires accountability and transparency throughout the repatriation process. As part of the District's commitment to anti-racism and decolonization, the District will strive to change harmful legacies and set a new trajectory using the following Guiding Principles to build on the work in progress with Native American Tribes:

3.1.1 Honor Tribal sovereignty by engaging in meaningful consultation; recognizing that Tribes are caretakers and owners of their cultural heritage; and understanding the specific concerns and issues facing California Indian Tribes.

3.1.2 Build and nurture meaningful relationships with Tribes through respectful and collaborative engagement.

3.1.3 Commit to consultation and repatriation in a timely manner by fully complying with the legal requirements to return and repatriate all Native American ancestors and cultural items.

3.1.4 Protect Native American ancestors and cultural items by following Tribal protocols for the treatment, handling, and storage of these items.

3.1.5 Require a written held-in-trust agreement in consultation with their legal steward (i.e. Tribes) to determine the terms and conditions including adjustments in stewardship and access preferences for the use of cultural items in teaching and college collections.

3.1.6 Demonstrate accountability and transparency by providing information requested by lineal descendants in a timely manner; protecting confidentiality of private and sensitive information; and monitoring any future changes to repatriation laws so they can be implemented in a timely manner.

3.1.7 Recognize the historical legacy of the social and biological sciences that has led to the collection of human anatomical remains from individuals who often did not consent to having their remains used for educational purposes.

4.0 Compliance Oversight

4.1 The District Office

With recognition of Tribal sovereignty, primary responsibility for compliance with the NAGPRA and the CalNAGPRA resides with the District Office. The Chancellor may designate an administrator (hereafter District Designee) to lead district wide College support, coordination, and oversight, including, but not limited to, the publication of summaries, inventories, and repatriation reviews. The District is committed to working towards the complete repatriation of all Native American ancestors and cultural items, except in cases where Colleges in the District may have agreements with governments of Native American Tribes for the storage and or use of cultural items. Additionally, the District/Colleges are committed to full compliance with the NAGPRA and the CalNAGPRA. Primary oversight for compliance with the NAGPRA lies with the District Designee. After compliance has been met, responsibility for compliance with changes to the law or new finds (i.e. newly found human remains or cultural items) lies with the Chancellor, and their appointed experts. The District Office is responsible for providing funding and resources for attaining and meeting compliance with federal and state repatriation laws. The District Office will provide resources to maintain compliance as needed, subject to future changes in law and in the case of new finds on District Colleges.

4.2 District NAGPRA Director

Until the District is compliant with all federal NAGPRA and state CalNAGPRA step requirements and District/Colleges no longer have possession or control of Native American ancestors and cultural items apart from held-in trust agreements with Tribes, the District shall have an experienced NAGPRA Director. After compliance with repatriation step requirements have been met, the Chancellor may designate an appointee for consultation purposes in cases of new finds or changes to law.

The NAGPRA Director shall have demonstrated experience working successfully with California Tribal leaders, members, and representatives to conduct repatriation duties, such as effectively consulting with Tribes and knowledge of the application of repatriation laws. Further, the NAGPRA Director shall be positioned under a District administrative authority with access to District resources, support, and College Presidents. Until the District is in compliance with federal and state NAGPRA requirements, the District Office shall regularly monitor the College repatriation progress and update the Board of Trustees and District Academic Senate.

5.0 Compliance

5.1 A detailed audit consisting of surveys and site inspections was undertaken of all College departments across the District in 2023-2024 to compile an updated comprehensive list of human remains and cultural items under the control of the District that may be subject to the NAGPRA and the CalNAGPRA. Moving forward,

if human remains or cultural items subject to the NAGPRA and the CalNAGPRA are newly found at a District facility, or if changes to these laws impact the use of human remains, cultural items, and other teaching materials in the classroom, the District will follow steps laid out in the federal NAGPRA regulations (Code of Federal Regs., title 43 and the California Health and Safety Code).

5.2 Federal NAGPRA regulations require the district to compile an itemized list of any human remains and associated funerary objects and to produce inventories and summaries of the District's collections. The District's NAGPRA Designee will have information on District holdings. If new finds are encountered at a College, guidelines under subsection 5.5 of this policy, Identifying and Reporting Collections, should be followed. Per NAGPRA (Code of Federal Regs., title 43) and CalNAGPRA (CHSC § 8013) consultation will occur with Tribes that may have a cultural affiliation, or Tribes associated with a geographical or aboriginal territory from when items or remains were acquired. This consultation will take place during any new inventory process.

5.3 The District will follow steps laid out in the federal NAGPRA regulations (Code of Federal Regs., title 43) and the California Health and Safety Code. Federal regulations require the District to

- 5.3.1 Initiate consultation as a means of collaboratively working towards meaningful repatriation (subsection 5.4 of this policy).
- 5.3.2 Consult on human remains, associated funerary objects, and other cultural items. Consultation should be engaged in according to a time and place agreed to by all consulting parties (subsection 5.4 of this policy).
- 5.3.3 Complete an inventory of human remains or associated funerary objects (subsection 5.5 of this policy).
- 5.3.4 Submit a notice of inventory completion (subsections 5.4 and 5.5 of this policy).
- 5.3.5 Receive and consider requests for repatriation (subsection 5.7 of this policy).
- 5.3.6 Respond to requests for repatriation (subsection 5.8 of this policy).
- 5.3.7 Repatriate human remains or associated funerary objects (subsection 5.8 of this policy).

Complete information about repatriation process steps for human remains and funerary objects can be found under Code of Federal Regulations, title 43 § 10.10, information about the parallel steps for other cultural items such as unassociated funerary objects, sacred objects, and objects of cultural patrimony are slightly different and can be found under Code of Federal Regulations, title 43 § 10.9.

5.4 Consultation

5.4.1 The elements of consultation are laid out under the NAGPRA and the CalNAGPRA. Consultation is the cornerstone of the law and spirit of the NAGPRA. It is a necessary first step towards ensuring that lineal descendants, Native American Tribes, and Native Hawaiian Organizations can engage with federally and state funded institutions to ensure the legal return of their ancestral remains and cultural items that are inalienable. Consultation is the foundational step of the repatriation process that guides how the District and consulting parties will carry out the legal requirements of returning human remains under the NAGPRA.

5.4.2 Under the CalNAGPRA, the District must consult with California Indian Tribes that are reasonably believed to be culturally affiliated with human remains or cultural items. This includes consulting with California Tribes without federal recognition. The District must follow federal NAGPRA step-processes as it is defined as a Museum under the NAGPRA.

5.4.3 The District, via the individual(s) designated by the Chancellor to consult and make consultation decisions on behalf of the District, shall be prepared to provide information pertaining to the relevant collections and holding prior, during, and after consultations as requested by the consulting parties (Code of Federal Regs., title 43 § 10.9(a)). Consultation shall include discussion on the appropriate storage and handling of human remains and cultural items in a culturally appropriate manner as determined by the consulting parties (Code of Federal Regs., title 43 § 10.9(d)). Individuals consulting on behalf of the District shall maintain an ongoing record of consultation history, or a consultation record, as this is a legal requirement (Code of Federal Regs., title 43 §10.9(c)). The District is required to consult with California Indian Tribes who are reasonably believed to be culturally affiliated with human remains or cultural items during the creation of preliminary inventories for the purpose of determining cultural affiliation (AB 275).

5.4.4 When consulting with Tribal governments regarding NAGPRA repatriation, consulting representatives from the District shall only recognize representatives designated by Tribal councils or governments as representing the interests of those governments or councils. This does not restrict the ability of the District to consult with lineal descendants to make repatriation requests.

5.4.5 Timeline

5.4.5.1 District consultation and repatriation efforts shall prioritize timely repatriations by consulting with affiliated Tribes regarding the timelines outlined in the NAGPRA (Code of Federal Regs., title 43 §10.9 and 10.10).

5.4.5.2 Preparation of federal notices and completion of repatriation statements shall be prioritized. If there are processes that delay repatriation, such as consultation efforts with other Tribes or completion of documentation, these should occur in a manner so that a federal notice or notice of intent to repatriate or dispossess is not delayed.

5.4.5.3 The District is legally obligated to initiate consultation with lineal descendants, Tribes, and Native Hawaiian Organizations. The Chancellor shall designate and authorize a District Designee to consult on behalf of the District. The District's Designee, or others working on their behalf, shall proactively contact consulting parties by telephone, paper, electronic communications, and meeting with Tribal Council members or their representatives if they prefer to arrange consultation in-person. The California Native American Heritage Commission maintains current California Indian Tribal contact information. The District Office shall maintain current and publicly accessible contact information for individuals charged with repatriation responsibilities.

5.4.6 Confidentiality

5.4.6.1 The District Designee consulting on behalf of the District shall respect a right of confidentiality for information shared by Tribes during consultations under the CalNAGPRA (CHSC §§ 8012(e)). Information with respect to Tribal traditional knowledge and all Tribal information shared during NAGPRA and CalNAGPRA consultations shall be kept confidential unless the contributing consulting party provides express authorized consent. Consultation information regarding traditional Tribal knowledge, the details of a Tribe's repatriation request, transfer or reburial will be considered confidential unless clearly stated otherwise.

5.4.6.2 Information shared from Tribes with the District office and its employees will be kept confidential to the extent allowed by law. Copies of official records made during NAGPRA consultations (e.g. consultation meeting notes which may include summaries, understandings, and action items) and relevant information shared for the purposes of repatriation efforts will be held in a secure location at the District office. These official records will only be available to individuals involved in consultation on behalf of the District, and the District's General Counsel's office, as necessary. Should the District receive a request for records used for the NAGPRA compliance under the Public Records Act, requests will be reviewed by the General Counsel's office to consider exemptions to disclosure under the CalNAGPRA (e.g. Cal Health

and Safety Code §8012(e) and California Evidentiary Code §1040).

5.4.6.3 Sensitive NAGPRA materials, including transcribed, reproduced or copied, photographed, digitally imaged, and/or audio or video recordings collected by District representatives for the purpose of consultation or repatriation will be kept confidential and be used for their intended purposes, and shall not be shared unless lineal descendants, Tribes, or Native Hawaiian Organization representatives provide written consent to share such information.

5.4.7 Stewardship for human remains and cultural items under our care

5.4.7.1 Each College shall care for, safeguard, and preserve any human remains or cultural items in its custody subject to the NAGPRA or the CalNAGPRA and shall make the best effort to provide a location to protect and secure collections from theft, environmental hazards, and harmful climate conditions. Federal NAGPRA regulations (Code of Federal Regs., title 43 § 1.1(d)) require consultation with lineal descendants, Indian Tribes, or Native Hawaiian Organizations on the appropriate treatment, handling, and storage of human remains and cultural items in the custody, control, or possession of the Colleges.

5.4.7.2 Once cultural affiliation has been determined through consultation with lineal descendants, Indian Tribes, or Native Hawaiian Organizations, no one shall access, handle, or relocate human remains without explicit consent from the consulting Tribal representative or lineal descendants. Access is defined as the ability to enter, approach, or pass to, or the ability to obtain or make use of something. Items not listed under LRCCD inventories and summaries under the NAGPRA or the CalNAGPRA which have been stored in these spaces, should be considered a priority for consultation and expedited return.

5.4.7.3 Directed by the District Designee, Colleges shall make a reasonable and good-faith effort to incorporate and accommodate the Native American traditional knowledge of lineal descendants, Indian Tribes, or Native Hawaiian Organizations in the storage, treatment or handling of human remains or cultural items. After consultation occurs - which requires that the consulting parties strive for consensus, agreement, or mutually acceptable alternatives to establish a duty of care in line with the wishes of lineal descendants, Indian Tribes or Native Hawaiian Organizations - an access log shall be maintained until repatriation occurs. The District Designee shall make clear who is allowed access to spaces where human remains, and cultural items are

stored, and handling instructions shall be made clear to authorized persons entering those spaces.

5.4.7.4 In the case of emergencies, the District will authorize individuals to access spaces in which the NAGPRA materials are stored only for the purposes of preservation from harm (e.g. water leaks or fire). Emergency action plans for the NAGPRA storage spaces will be discussed with Tribes during consultation meetings.

5.4.7.5 The District Designee must obtain written free, prior, and informed consent from lineal descendants, Indian Tribes, or Native Hawaiian Organizations before allowing any exhibition of, access to, or research on human remains or cultural items covered by the NAGPRA.

5.5 Identifying and Reporting Collections

5.5.1 The NAGPRA and the CalNAGPRA require the creation and submission of inventories and summaries. The NAGPRA and the CalNAGPRA require consultation with culturally affiliated and potentially affiliated lineal descendants, Tribes, and Native Hawaiian Organizations and the incorporation of these results during the identification of human remains, cultural items, sacred objects, objects of cultural patrimony and the development and completion of these inventories and summaries.

5.5.2 Should new human remains or cultural items subject to the NAGPRA be found in the District, the District Designee or NAGPRA Director shall, to the best of their ability, initiate contact to inform relevant Tribes within 7 working days. The District Designee or the NAGPRA Director shall make efforts to gather documentation relevant to newly found human remains and cultural items to make available during consultation.

5.5.3 Hazardous substances and contamination histories

5.5.3.1 Federal NAGPRA requires that the District report any known hazardous substances that have been used to treat or preserve human remains and cultural items (Code of Federal Regs., title 43 § 10.9(a)). When compiling information for inclusion in inventories and summaries, the District Designee shall compile contamination histories to provide to culturally affiliated or potentially affiliated lineal descendants, Indian Tribes, and Native Hawaiian Organizations. Harmful substances may include pesticides, mercury, arsenic, or any other substances used for the purposes of preservation as well as exposure to mold or other risks to human health that may be encountered via handling. Contamination information will be disclosed early in the

consultation process to determine proper physical and cultural protective protocols.

5.5.3.2 In the event that future human remains or materials subject to the NAGPRA or the CalNAGPRA are found in the control of the District which have been contaminated by hazardous substances, the District shall provide options for testing or removal of contaminants that minimize handling and destructive treatments.

5.6 Updates to Inventories and Summaries

5.6.1 If new human remains or cultural items are found that may be subject to the NAGPRA or the CalNAGPRA, the District Designee shall update the inventories and summaries that have been previously submitted to the National Parks Service and the Native American Heritage Commission in a timely manner. Updates to inventories or summaries must be determined with consultation of culturally affiliated or potentially affiliated Tribes. Updates will include the identification of human remains or cultural items that may have been previously classified as 'culturally unidentified' but have since been determined to be culturally affiliated through newly obtained information, including, but not limited to, Tribal traditional knowledge, which is identified as expert opinion under the NAGPRA (Code of Federal Regs., title 43 § 10.2).

5.6.2 In the event of new finds of previously unknown human remains or cultural items, College staff or faculty shall report immediately to their area Dean, who will then report to the College Vice President of Instruction. College Vice Presidents of Instruction should then report any finds to the District Designee. The District Designee shall immediately notify the culturally affiliated or potentially affiliated Tribe(s). The District Designee will then initiate consultation, develop and submit federal inventories or summaries according to the timelines laid out under the current rule version of the NAGPRA and the CalNAGPRA (Code of Federal Regs., title 43 §§ 10.9(a) and § 10.10 (d)). Updates of inventories and summaries shall also be made to the California Native American Heritage Commission under the Tribal resources, preliminary, or final entry databases.

5.6.3 The District Office shall provide an accessible means to receive anonymous reports of collections or items in a College's possession or custody (e.g. an anonymous form on a District NAGPRA compliance page). The District Designee shall follow up any credible reports with the College President or their designee. The District Designee will then follow the required steps to report unknown human remains or cultural items outlined in this section.

5.6.4 Receipt of human remains or cultural items through donation

5.6.4.1 The District will not accept control of human remains of unknown origin, or control of human remains or cultural items subject to the NAGPRA or the CalNAGPRA following an assessment of provenience. Members of the public with human remains in their possession that approach District faculty or staff with human remains of unknown origin should be referred to the County Coroner's Office pursuant to CHSC 7050.5. In these cases, the County Coroner determines if the remains are Native American for purposes of the NAGPRA and NAHC jurisdiction. The County Coroner will contact the NAHC when appropriate (https://nahc.ca.gov). The presence of human remains or cultural items on a College campus does not necessarily constitute the District having legal control of those remains or cultural items.

5.7 Cultural Affiliation and Repatriation

5.7.1 To achieve repatriation of Native American ancestors and cultural items, the District shall use lines of evidence and standards of proof as stipulated in the NAGPRA and the CalNAGPRA including anthropological, archaeological, biological, folkloric, geographical, historical evidence, kinship, linguistics, oral tradition, or other relevant information including Tribal traditional knowledge. From this information the District Designee, in consultation with NAGPRA experts and Tribes, shall determine cultural affiliation (CHSC § 8013). Per federal NAGPRA regulations cultural affiliation must be made in writing using one of the following criteria for determination 1. The human remains or cultural items are identified clearly by the information available, 2. Are identified reasonably by the geographical location or acquisition history, or 3. Cannot be clearly or reasonably identified. A single line of evidence may be sufficient to determine cultural affiliation. Under the federal NAGPRA Code of Federal Regulations, title 43, section 10.3 cultural affiliation does not require exhaustive studies, additional research, or continuity through time. Cultural affiliation is not precluded solely because of reasonable gaps in the information available. The District has an obligation to make good faith efforts to identify and gather all existing information and documentation to inform determinations of cultural affiliations.

5.7.2 The District shall repatriate human remains and cultural items following the step processes under Code of Federal Regs., title 43. If the District receives competing claims for repatriation for human remains and cultural items published in inventories and summaries, then determinations regarding competing claims are the responsibility of the District Designee and the NAGPRA Director. If there are competing claims, the District will conduct outreach to confirm if there are conflicts by contacting competing parties while maintaining discretion of consultation.

5.8 Repatriation

5.8.1 The District Designee shall respond to requests for repatriation in a timely manner and follow the legal processes to repatriate or return culturally affiliated Native American ancestors and cultural items. The federal process includes the creation and submission of federal notices and repatriation statements or transfer of control notices. In addition to the federal process, notices and statements shall be submitted to the California Native American Heritage Commission with reference to the appropriate NAHC inventory or summary entry.

5.8.2 Repatriation timelines shall be determined in consultation with the lineal descendant, Indian Tribe, or Native Hawaiian Organization to which legal control has been transferred (Code of Federal Regs., title 43 § 10.9 and 10.10. Individuals appointed by the Chancellor on NAGPRA matters shall consult on the process and protocols to complete the repatriation in a timely manner. Transfer of possession shall be offered concurrently with transfer of legal control. The District Designee shall maintain contact with Indian Tribes or Native Hawaiian Organizations for the purposes of timely repatriation and shall track transfers and reburial preparation and report annually on all pending and completed transfers until human remains or other cultural items subject to the NAGPRA are no longer under the control of the District. Reporting on progress towards the NAGPRA and the CalNAGPRA compliance is the responsibility of the District Designee. An annual report shall be given to the District Academic Senate and the Chancellor until the District is in compliance with federal and state repatriation laws.

5.8.3 Held-in-trust

5.8.3.1 The goal of the District's repatriation efforts is the complete repatriation of ancestors and cultural items subject to the NAGPRA under the control of the District. At the written request of the lineal descendant, Indian Tribe, or Native Hawaiian Organization to which legal control has been transferred, the College may retain stewardship of these human remains or cultural items until physical transfer can occur, until the point where Colleges in the District no longer has human remains or cultural items subject to the NAGPRA in its care. The College in conjunction with the District shall generate a written held-in-trust agreement in consultation with the legal owner to determine the terms and conditions including adjustments in stewardship preferences and access needs. Colleges will accommodate requests within reason and to the best of their abilities. If the written agreement terms are longer than one year, the agreement shall be reviewed annually by the District Designee for NAGPRA consultation and other consulting parties from the signature date on the agreement.

5.8.3.2 Additionally, the District recognizes that lineal descendants, Indian Tribes, and Native Hawaiian Organizations may wish to work with faculty to highlight their history and cultural practices. The District may enter into held-in-trust agreements with Tribal governments to allow for the use of cultural items for education purposes after obtaining explicit free and prior permission from Tribal governments.

5.8.3.3 LRCCD will develop held-in-trust forms to be used after repatriation and will include the District Designee's signature, description of the item, duration of use, terms of use, consent of use, and the signature of lineal descendants or legal representatives of Native Hawaiian Organizations and Native American Tribal governments. LRCCD will accept held-in-trust forms and written agreements received from lineal descendants, federally recognized Tribes and Native Hawaiian Organizations as a result of NAGPRA consultations. The use of any cultural items for educational purposes derived from held-in-trust agreements must specify in writing that lineal descendants, Tribes, and Native Hawaiian Organizations are giving free, informed, and prior consent.

5.9 Appeals after Publication

5.9.1 Lineal descendants, Indian Tribes, or Native Hawaiian Organizations may appeal the District's decision pertaining to the contents of federal notices of inventory completion and/or summaries, determinations of cultural affiliation, identification of cultural items, or the repatriation process, before repatriation has occurred, by contacting the District's NAGPRA Designee or NAGPRA Director. Appeals may be submitted for review by contacting the District Designee or NAGPRA Director. Within 30 days of an appeal the Chancellor will decide to uphold, reverse, or modify the determination, where legal. The Chancellor will provide a written explanation for their decision, following consultation with the District Designee, NAGPRA Director, District content experts, and outside content experts (e.g. the NAHC). The District will make every possible effort to see resolution of conflicts before escalation. If a resolution cannot be made via the District and other parties, the District may seek the assistance of the federal NAGPRA Review Committee in resolving disputes. The District will acknowledge and respect any decision, result, or settlement rendered by a mediating body.

5.10 Teaching and Research

5.10.1 All Colleges and district facilities in the possession of human remains and cultural items subject to the NAGPRA and the CalNAGPRA are prohibited from using these human remains and cultural items for the purposes of teaching or research, without written free and prior consent

from affiliated Tribes.

5.10.2 Pursuant to the CalNAGPRA, human remains and cultural items undergoing the repatriation process, including consultation and the process of determining cultural affiliation for the process of producing summaries and inventories, shall not be used for teaching or research. Human remains, associated funerary objects, unassociated funerary objects, sacred objects, and objects of cultural patrimony which are under review to determine if they are subject to the NAGPRA shall not be used for teaching until their status has been determined.

5.10.3 Prior to allowing any exhibition of or access to any Native American human remains or cultural items undergoing the repatriation process, and prior to allowing study, analysis, examination, or other means of acquiring or preserving information about those items. Under the informed consent requirements of federal NAGPRA Colleges must obtain written free, prior, and informed consent from lineal descendants, Indian Tribes, or Native Hawaiian Organizations (Code of Federal Regs., title 43 §§ 10.1(d) and 10.2).

5.10.4 The District shall commit resources to replace any materials used in teaching that are repatriated through the NAGPRA and the CalNAGPRA processes with faculty-determined appropriately equivalent materials that are compliant with the law.

5.10.5 Field programs in the United States on federal, state, and municipal land that engage in intentional ground disturbance, such as excavation or test probes, must follow the consultation guidelines established under a variety of laws (e.g., NAGPRA, CalNAGPRA, ARPA, NEPA, CEQA) which require consultation with Native American Tribes. Field programs in the United States where ground disturbance takes place on private lands require permission from the landowner. In the case of LRCCD field programs where ground disturbance will take place on private property, it is strongly encouraged that advance consultation takes place to identify Tribal cultural resources, which are protected under federal and state laws. Consultation will help plan for possible inadvertent discoveries and for the dissemination of any relevant research to Tribal governments. In line with this, the District does not accept the curation of new collections subject to the NAGPRA or the CalNAGPRA.

5.10.6 Faculty preparing to conduct ground disturbing field programs in the United States for course credit will provide a description of field program activities and the locations where such activities will take place to their Dean. This information will also be shared with the District Designee or NAGPRA Director. A field program is any recurring mentored program or project which takes place outside of the classroom longer than one day that is supervised by faculty and is taken for course credit. Descriptions of

ground disturbing field programs will be posted as a link on the District website which also contains NAGPRA information. Information regarding the exact location of field programs is not public for purposes of student, faculty, and staff safety. We invite Tribes to inquire with the District Designee or NAGPRA Director for specific details about these programs. Feedback on all announced field programs are welcomed by the public and can be shared with the NAGPRA Director or the District Designee, especially concerns regarding possible impacts on cultural resources. All feedback will be shared with faculty and staff leading field programs.

5.10.7 Consistent with the First Amendment of the Constitution and the principles of academic freedom, Los Rios affirms the right of faculty to use images, photos, and replicas as allowed by law.

5.11 Repatriation of human remains and cultural items under the NAGPRA and the CalNAGPRA.

5.11.1 Once a culturally affiliated Tribe(s) has made a repatriation request and the notice of intended repatriation has been published in the federal register (Code of Federal Regs., title 43 §10.10 (k)) and a copy sent to the California Native American Heritage Commission, the individual tasked with consultation will provide a copy of the final NAGPRA inventory and/or summary to the Chancellor. Within a transfer of custody agreement between the District and the Tribe(s), the Chancellor will confirm that the items have been deaccessioned. The transfer of custody agreement will be signed by the Chancellor and the culturally affiliated Tribe(s). No other approvals or reviews are needed to transfer human remains or cultural items.

5.11.2 LRCCD staff responsible for NAGPRA compliance (i.e. NAGPRA Director or District Designee) will assist lineal descendants, Tribes, and Native Hawaiian Organizations in the transfer and reburial process to the best of their ability. The District will help Tribes offset repatriation transport and on-site visit costs when funds are available. The District will also support other ways to fund repatriation costs, including providing written support for, or the application of repatriation grants.

5.11.3 The District Office will maintain a record of transfer of custody agreements for all repatriated Native American ancestors and cultural items.

6.0 Non-Compliance

6.1 Under federal NAGPRA regulations and CalNAGPRA, allegations of institutional non-compliance may be submitted directly to the US Secretary of the Interior (Code of Federal Regs., title 43 § 10.11) or the NAHC (CHSC § 8029). The Colleges are liable for civil penalties for violation of these laws.

6.2 Individuals may be liable for criminal penalties for NAGPRA violations under 18 U.S.C.A. 1170, which states whoever knowingly sells, purchases, uses for profit, or transports for sale or profit, the human remains of a Native American without the right of possession to those remains as provided in the Native American Graves Protection and Repatriation Act shall be fined in accordance with this title, or imprisoned not more than 1 year and 1 day, or both, and in the case of a second or subsequent violation, be fined in accordance with this title, or imprisoned not more than 10 years, or both. Additionally, whoever knowingly sells, purchases, uses for profit, or transports for sale or profit any Native American cultural items obtained in violation of the Native American Grave Protection and Repatriation Act shall be fined in accordance with this title, imprisoned not more than one year, or both, and in the case of a second or subsequent violation, be fined in accordance with this title, imprisoned not more than 10 years, or both.

7.0 Administrative Regulation

7.1 If regulations to implement this policy are needed, The District in consultation with the District Academic Senate shall facilitate constituent participation in drafting these regulations, including discipline faculty teaching with human remains.

LRCCD

Policy Adopted:
Policy Revised:
Policy Reviewed:
Adm. Regulation:

DAS Approved P-7920 Human Remains Policy

1.0 Purpose and Scope

1.1. This policy establishes a clear process for the use and acquisition of human remains in the Los Rios Community College District (LRCCD). Teaching with human remains is part of standard and best practices in medical, scientific, and forensic fields and has been an essential part of teaching in science classes and laboratories since the foundation of the District.

1.2. The approval of this policy will mark the end of the moratorium and human remains and teaching materials not subject to the NAGPRA and the CalNAGPRA (in accordance with District Policy 7910) shall be returned to their respective departmental teaching collections in a timely manner.

1.3. This policy reaffirms the rights of departments to develop their own best practices as it relates to the use and care of human remains in their collections, so long as they do not conflict with the treatment of human remains outlined in federal or

state law.

1.4. Consistent with the First Amendment of the Constitution and the principles of academic freedom, Los Rios affirms the right of faculty to use images, photos, and replicas as allowed by law.

2.0 History of the Human Remains Policy

2.1. From 2023-2025, a moratorium on the use of human remains was instituted while the District completed a full audit of the LRCCD in order to ensure compliance with the Native American Grave Protection and Repatriation Act (NAGPRA) and the California Native American Grave Protection and Repatriation Act (CalNAGPRA). Some of the human remains previously in the LRCCD collections have been, or are currently, undergoing repatriation under the NAGPRA and the CalNAGPRA.

2.2. Prior to the federal passage of the NAGPRA in 1990, the vast majority of the collections of Jeremiah Lillard previously held by the Sacramento Junior College Museum had been transferred to UC Berkeley. Continued repatriation efforts were hindered by incomplete records and lack of institutional support, though faculty consistently aimed for compliance. As of 2012, no District employees were knowingly responsible for obtaining Native American human remains or cultural items under the District's control.

2.3. At the time of the 2021 passage of CA Bill AB 275, the amendment of the CalNAGPRA, faculty at American River College renewed their concerns to the administration that some cultural items and human remains would need to be reevaluated in anticipation of changes to this law. However, at the time the District did not have a designated expert working towards NAGPRA compliance, nor did it have a NAGPRA policy, resulting in a lack of coordinated efforts toward compliance across the District.

2.4. As a result of these events, the District:

2.4.1. contracted a NAGPRA consultancy firm in fall of 2022 to provide legal guidance;

2.4.2. expanded the ARC moratorium District-wide in fall of 2023 after an affirmation vote of the District Academic Senate;

2.4.3. directed departments at all Colleges and satellite centers to provide detailed lists of their collections;

2.4.4. removed all human remains, regardless of cultural affiliation, and all Native American cultural items from departments, as well as many

replicas of both Native and non-Native human remains and cultural items. These were stored with the guidance of local Tribes;

2.4.5. convened a faculty weighted Moratorium Taskforce, at the direction of the District Academic Senate, to write the NAGPRA (P-7910) and human remains policies;

2.4.6. hired a Director of Native American Graves Protection and Repatriation Act and Special Projects in spring of 2024 to further assist with legal and ethical advice on policy development; and

2.4.7. on [date], the Los Rios District acknowledged that the lack of a coherent NAGPRA policy has led to unintended harm to the reputations of faculty members who had been diligently working to comply with the NAGPRA and the CalNAGPRA. A resulting legal investigation has exonerated all current faculty from any wrongdoing.

3.0 Receipt of Human Remains or Cultural Items through Donation or Purchase

3.1. The District will not accept control of human remains of unknown origin, or control of human remains or cultural items subject to the NAGPRA or the CalNAGPRA following an assessment of provenience.

3.2. Members of the public with human remains in their possession that approach District faculty or staff with human remains of unknown origin should be referred to the County Coroner's Office pursuant to CHSC 7050.5. In these cases, the County Coroner determines if the remains are Native American for purposes of the NAGPRA and the California Native American Heritage Commission (NAHC) jurisdiction. The County Coroner will contact the NAHC when appropriate (https://nahc.ca.gov). The presence of human remains or cultural items on a College campus does not necessarily constitute the District having legal control of those remains or cultural items.

3.3. In some cases, new human remains with known provenance, not subject to the NAGPRA or the CalNAGPRA, may come under control of the District through donation. Accredited body donation programs have an existing process for documenting legal consent per the Uniform Anatomical Gift Act (AB 1689) and therefore do not require additional approval or NAGPRA compliance tracking by the District. In other cases, faculty from the department seeking to accept control of these remains will form a departmental committee and then provide their campus Vice President of Instruction with a recommendation to be forwarded to the District's General Counsel's Office. Legal documentation identifying the right of disposition to the District should be provided (e.g. via the individual or next of kin). Copies of this documentation will be maintained by the District Designee or NAGPRA Director. Afterwards this recommendation would be reviewed by the

District NAGPRA Designee and the District General Counsel's Office for consideration. The District Designee with the General Counsel at the District, in consultation with faculty, ultimately determines whether to accept or reject control of remains with reasoning documented in writing to the requesting faculty committee. This process should ensure that the transfer of control is legal and does not subject the District to undue liabilities or financial burdens. The determination to reject shall be made only due to compelling reasons of legal liability in accordance with the NAGPRA and the CalNAGPRA, or fiscal hardship.

3.4. Any donations or acquisitions that may contain cultural materials protected by repatriation laws must be reviewed by the Department Chair and/or department designated content expert to assess provenience. If there is a question as to whether cultural items may be subject to repatriation laws, then the Department Chair and/or department designated content expert must contact the NAGPRA Director or District Designee for further evaluation.

3.5. The Director of NAGPRA and Special Projects or the District Designee will maintain a database of all existing and newly acquired human skeletal remains, which will be assigned a unique ID for compliance tracking. Requisition form GS-32 will include a category identifying the purchase of human skeletal remains. Any purchase orders including human skeletal remains should be forwarded to the NAGPRA Director or the District Designee to maintain legal compliance.

4.0 Teaching and Research

4.1. In order to ensure academic freedom, the District:

4.1.1. shall not abridge, or in any way inhibit, the right of faculty to exercise academic freedom and freedom of speech afforded to them by applicable laws and the LRCFT/LRCCD Collective Bargaining Agreement;

4.1.2. affirms the right of faculty to determine the appropriate content and topics to be discussed in their courses to meet course student learning outcomes and to select appropriate methods and materials;

4.1.3. affirms the right of faculty and students to work with human remains for educational or research purposes according to the law and the ethical standards of specific disciplines; and

4.1.4. affirms the right of faculty to pursue the purchase of human remains and cultural items not subject to the NAGPRA and the CalNAGPRA. If a purchase request is denied, the Department will be provided with a written rationale by the College or District explaining the reason for the denial (e.g. violates the NAGPRA, budget) and informing faculty of an appeals process.

4.2. Repatriation of human remains and cultural items apart from NAGPRA, CalNAGPRA, or other repatriation laws.

4.2.1. Departments who wish to repatriate human remains or cultural items under their control that are not subject to the NAGPRA, the CalNAGPRA, or other repatriation laws may do so according to their department's best practices. Various college departments have inherited legacy collections that may include remains of individuals who departments feel should be repatriated for ethical reasons. As content experts, faculty in the various departments within the District will have express control over the repatriation or retention of human remains in their trust that are not subject to repatriation laws, where international provenience can be identified, and where identifiable descendent authorities are interested or willing to take custody of these remains.

4.2.2. The District shall supply funding resources in Reserves for these ongoing efforts, including funding for replacements as per the needs of each department, since adequate replacements may not yet be available.

4.2.3. The NAGPRA Director or the District Designee will assist with faculty efforts in identifying provenance, identifying descendent authorities, and coordinating with departments to these ends. Department requests for these repatriation efforts should be made via their respective deans and then to the Vice President of Instruction so it can be shared with the District Designee at the District Office. Decisions on who to contact for repatriation efforts outside of the NAGPRA will be determined by departments with support from the District NAGPRA Designee as they have experience with repatriation and consultation efforts. Afterwards, a transfer of custody agreement will be signed by the Chancellor and the consulting parties.

4.2.4. Departments who may need to dispossess human skeletal remains not subject to the NAGPRA or the CalNAGPRA used in teaching collections, may do so according to state and federal laws, and departmental best practices (e.g. cremation or burial).

5.0 Administrative Regulation

5.1 If regulations to implement this policy are needed, The District in consultation with the District Academic Senate shall facilitate constituent participation in drafting these regulations, including discipline faculty teaching with human remains.

Policy Adopted:
Policy Revised:

Policy Reviewed:
Adm. Regulation:

PREP Subcommittee

Summary Recommendations for Academic Senate Consideration v1

Purpose

The PREP Subcommittee has reviewed the academic, student-support, governance, and institutional structures supporting the Los Rios Prison Education Program (PREP).

The review recognizes that PREP operates within the unique security and operational requirements of correctional institutions while remaining an academic program of the Los Rios Community College District. As PREP has grown, it has increasingly required coordination across colleges, academic programs, student services, re-entry programs, and the California Department of Corrections and Rehabilitation (CDCR).

The recommendations below are divided into two categories:

- **Academic and professional matters within Academic Senate purview; and**
- **Institutional and administrative matters outside direct Senate purview that materially affect PREP's educational effectiveness and sustainability.**

I. Recommendations Within Academic Senate

Purview 1. Integrate PREP into Academic Governance and

Institutional Planning

PREP should be systematically included in Academic Senate consultation, educational program development, accreditation, institutional planning, and program review processes.

2. Develop PREP as a Coherent Guided Pathways Program

PREP should have predictable course sequencing and educational pathway maps supporting degree completion, transfer, and continuation of education following release.

3. Strengthen Counseling and Student-Support Integration

Counseling, tutoring, DSPS, library/research resources, and other academic support services should be integrated into PREP educational planning. Counseling should connect directly with Guided Pathways, degree completion, transfer, and re-entry planning.
The District should also evaluate whether current counseling resources are sufficient for the size, complexity, and multi-college nature of PREP.

4. Create a Continuous Incarcerated-to-Re-entry Educational Pathway

PREP, Rising Scholars, re-entry programs, counseling, and related student-success programs should be coordinated so that incarceration, release, re-entry, and continued college enrollment are treated as stages of a continuous educational pathway.

5. Broaden Participation in PREP Academic Planning

PREP governance and academic planning should include appropriate representation across all four Los Rios colleges. Re-entry coordinators and other programs serving justice-impacted students should be invited to participate in PREP planning and advisory structures where appropriate.

6. Maintain Faculty Authority Over Curriculum and Strengthen Senate Participation

PREP course selection, sequencing, instructional planning, and educational program development should operate through the same faculty-governance principles applicable to other Los Rios academic programs.

7. Establish a Sustainable PREP Professional-Development Framework

PREP should maintain and strengthen Communities of Practice, faculty onboarding, mentoring, facility-specific preparation, and sharing of instructional best practices, with appropriate Academic Senate participation.

8. Incorporate PREP into Formal Program Review and Academic Effectiveness Assessment

PREP should participate in regular program review and assessment of educational pathways, student outcomes, student-support access, and overall academic program effectiveness. Results should inform appropriate Senate and institutional planning processes.

II. Institutional Recommendations Outside Direct Academic

Senate Purview

The following recommendations involve administrative organization, staffing, or interagency relationships and therefore extend beyond the Senate's direct 10+1 responsibilities.
They are included because these institutional conditions materially affect the District's ability to accomplish the academic and professional objectives identified above.

9. Strengthen District-Level Administrative Oversight

The District should consider returning primary administrative responsibility for PREP to the District and assigning a district-level administrator above the dean level with substantial designated responsibility—potentially **at least 0.5 FTE**—for PREP oversight.

Responsibilities should include cross-college coordination, institutional planning, student pathway integration, and management of the District's relationship with CDCR.

10. Establish a Formal LRCCD–CDCR Communication and Escalation Structure

LRCCD and CDCR should establish clear communication channels at appropriately aligned levels of organizational authority.

Routine matters should be resolved at the lowest appropriate operational level. Recurring problems, policy conflicts, resource commitments, or issues affecting educational requirements should be promptly elevated to representatives of both institutions with sufficient authority to address them.

Periodic communication between senior LRCCD and CDCR leadership should support this structure.

11. Establish a Districtwide PREP Coordination Function

The District should consider establishing a PREP coordinator or comparable districtwide function responsible for maintaining relationships and communication among:

- PREP faculty and administration;
- the four Los Rios colleges;
- counseling and student-support programs;
- Rising Scholars and re-entry coordinators;
- CDCR personnel; and
- other institutional partners serving justice-impacted students.

The position would focus on cross-campus coordination, student pathway continuity, partnership development, communication, and follow-through.

Overall Direction

PREP has developed beyond a collection of courses offered at correctional facilities. It increasingly functions as a **districtwide educational program serving students across incarceration, degree completion, transfer, release, and re-entry**.

The Subcommittee's recommendations are intended to strengthen the academic and institutional structures necessary to support that mission while recognizing the respective responsibilities of the Academic Senate, District administration, LRCFT, the individual colleges, and CDCR.

The Academic Senate can act directly on the academic and professional recommendations in **Items 1–8** and can support or forward **Items 9–11** to the appropriate District and institutional authorities for consideration.

Report to the District Academic Senate

PREP Subcommittee Review of Institutional Alignment, Academic Governance, and Program Sustainability

Prison Education Program (PREP)

Los Rios Community College District

Draft for Senate Review and Discussion

May 2026

I. Introduction and Scope

The District Academic Senate PREP Subcommittee conducted this review of the Los Rios Prison Education Program (PREP) in light of:

- the LRCFT/LRCCD Prison Education Program Memorandum of Understanding (2024–2026),
- CDCR/Los Rios facility MOUs,
- California Education Code,
- Academic Senate “10+1” responsibilities,
- and the evolving operational and institutional requirements associated with prison education.

Over the course of this review, committee discussions consistently returned to one central observation: PREP has evolved into a large, complex, multi-site educational initiative requiring levels of coordination and institutional integration that extend well beyond the structures typically associated with a supplemental instructional program.

The committee recognizes that prison education programs necessarily operate within environments shaped by:

- correctional security requirements,
- operational limitations,
- interagency coordination,
- and institutional structures distinct from traditional college campuses.

At the same time, PREP is an academic program of the Los Rios Community College District and is therefore subject to:

- Education Code,
- accreditation expectations,
- Academic Senate governance structures,
- institutional planning processes,
- and collective bargaining agreements.

The PREP MOU explicitly states:
“The District will work collaboratively with faculty and their Union and Senate representatives to protect and maintain the educational standards necessary for complying with Education Code, Los Rios Policy and Regulations, 10+1, and the Collective Bargaining Agreement.”

This report is organized into two sections:

1. Academic and professional matters directly within Academic Senate purview; and 2. Institutional and operational observations outside direct Senate purview but materially affecting the educational effectiveness and long-term sustainability of the PREP program.

The purpose of this report is not to assign fault or evaluate labor matters. Rather, the committee seeks to identify institutional conditions necessary to support a sustainable, academically integrated prison education program aligned with District educational goals and obligations.

II. Findings and Recommendations Within Academic Senate Purview

A. Educational Program Development and Guided Pathways Discussion

The current CDCR/CCC MOU framework envisions substantially more than isolated course offerings within correctional institutions. The agreements reference:

- educational planning,
- transfer preparation,
- counseling,
- tutoring,
- student supports,
- and guided educational pathways designed to support degree completion and continued post-release education.

PREP has developed important foundational elements toward these goals, including dedicated counseling support and expanding instructional offerings across multiple institutions. However, the review suggests that PREP is not yet fully integrated into the District's broader Guided Pathways framework in the same manner as traditional campus programs.

Several recurring themes emerged during committee discussion:

- pathway sequencing remains uneven,
- educational planning structures vary by location,
- counseling support is limited relative to program scale,
- and institutional coordination between PREP and broader student success systems remains incomplete.

The committee also discussed the importance of viewing incarcerated students and formerly incarcerated students as part of a continuous educational pathway rather than as separate populations served by disconnected programs.

Current structures appear to create barriers between:

- PREP,
- re-entry support services,
- campus-based Rising Scholars programs,
- counseling,

- transfer services,
- and Guided Pathways planning.

The committee believes there is an opportunity to strengthen these connections in ways that better support student continuity from incarceration through re-entry and continued enrollment.

Relevant 10+1 Areas

- Curriculum
- Degree and certificate requirements
- Educational program development
- Standards or policies regarding student preparation and success
- Processes for program review

Recommendations

The District Academic Senate should recommend that:

1. PREP be formally incorporated into District and college Guided Pathways planning efforts; 2. PREP students receive structured educational pathway maps where operationally feasible; 3. PREP counseling structures be integrated into broader institutional student success planning; 4. PREP be incorporated into regular program review and institutional effectiveness cycles; 5. Greater coordination be developed between PREP and campus re-entry support programs to strengthen educational continuity for justice-impacted students;
6. Re-entry coordinators from all four colleges be invited to participate in PREP-related planning and advisory discussions where appropriate;
7. The District explore expanded counseling participation from multiple colleges to support the growing scale and complexity of PREP student needs.

B. Curriculum Governance and Faculty Authority

Discussion

The PREP MOU explicitly states:

“curriculum taught in CDCR facility is the purview of the Los Rios Community College District and its faculty.”
The MOU further affirms:

“authority over curriculum... remains with the faculty.”

Although PREP faculty continue to exercise substantial leadership within the program, committee discussions highlighted concerns that PREP curriculum and instructional planning have not yet been fully integrated into existing Academic Senate governance structures in the same manner as traditional campus instructional programs.

The committee recognizes that correctional environments necessarily impose operational and security limitations that can affect:

- scheduling,
- technology,
- materials,
- and classroom operations.

However, the committee also believes that continued faculty participation in:

- curriculum planning,
- instructional development,
- governance discussions,
- and institutional academic planning

is essential to maintaining academic integrity and institutional consistency.

Relevant 10+1 Areas

- Curriculum
- Educational program development
- Faculty roles in governance
- Faculty roles in accreditation

Recommendations

The District Academic Senate should recommend that:

1. PREP curriculum planning include formal faculty governance participation;
2. PREP faculty maintain integration with discipline and curriculum discussions;
3. PREP be included in institutional accreditation and academic planning discussions; 4. PREP-related committees and advisory structures include broader cross-campus faculty participation where appropriate;
5. Faculty consultation structures regarding instructional constraints within correctional facilities be clarified and strengthened.

C. Professional Development and

Faculty Support Discussion

The PREP MOU recognizes that:

“Professional Development is a professional and academic matter.”

The MOU further states:

“Professional Development for the PREP program will be developed with the Academic Senate PREP committee input.”

Faculty discussions consistently highlighted the highly specialized nature of prison education work. PREP faculty operate within environments requiring:

- facility-specific preparation,
- trauma-informed awareness,
- operational training,
- institutional coordination,
- and sustained instructional support.

The current MOU establishes important training and Community of Practice structures. At the same time, PREP’s growth appears to be creating increasing demand for:

- mentoring,
- onboarding support,
- continuity planning,
- instructional resource sharing,
- and long-term institutional knowledge development.

Relevant 10+1 Areas

- Policies for faculty professional development activities
- Instructional improvement
- Educational program development

Recommendations

The District Academic Senate should recommend that:

1. PREP professional development continue developing within a sustained institutional framework; 2. PREP Communities of Practice continue and expand;
3. Faculty mentoring and onboarding structures be formalized;

4. PREP instructional best practices be documented and shared institutionally;
5. Professional development planning continue in collaboration with Academic Senate structures.

D. Student Support Services and Academic Equity Discussion

The review suggests that PREP has not yet achieved full integration of student support systems comparable to traditional campus structures.

The PREP MOU references:

- counseling,
- tutoring,
- technical support,
- and supplemental educational services.

Committee discussions repeatedly emphasized the importance of recognizing incarcerated students as part of the District's broader equity, student success, and transfer mission.

The committee also discussed the possibility that PREP and re-entry programs may benefit from functioning less as separate initiatives and more as connected components of a larger educational continuum supporting justice-impacted students before and after release.

Relevant 10+1 Areas

- Standards or policies regarding student preparation and success
- Educational program development
- Institutional planning

Recommendations

The District Academic Senate should recommend that:

1. PREP student support systems be reviewed for institutional integration and continuity; 2. PREP students be incorporated into broader equity and student success planning discussions; 3. PREP counseling and support systems continue developing toward pathway-based models where feasible;
4. Institutional planning structures explicitly include incarcerated and formerly

incarcerated students; 5. The District explore opportunities for increased collaboration between PREP, Rising Scholars, counseling, and re-entry support programs across all four colleges.

III. Institutional and Operational Considerations Outside Direct Senate Purview

The committee recognizes that the following observations are not fully within Academic Senate purview. However, these issues materially affect the PREP program's ability to fulfill its educational mission and maintain long-term institutional stability.

A. Institutional Alignment Between LRCCD and CDCR Discussion

PREP requires sustained coordination between two large public institutions operating under:

- different organizational structures,
- distinct legal frameworks,
- and different operational priorities.

Committee discussions frequently returned to the complexity of maintaining alignment between:

- educational systems,
- correctional systems,
- faculty governance structures,
- student support systems,
- and operational security requirements.

Many operational challenges appear less connected to isolated personnel or procedural issues and more connected to the difficulty of sustaining long-term institutional coordination across multiple facilities, colleges, and administrative systems.

The committee believes long-term sustainability may depend upon continued development of:

- stable communication pathways,
- consistent institutional relationships,
- and appropriately aligned operational coordination structures.

The following matrix is offered solely as a conceptual illustration of institutional coordination structures and not as a rigid organizational equivalency model.

Illustrative Institutional Coordination Matrix

CDCR Institutional Level	Approximate Functional LRCCD Equivalent	Typical Coordination Role
CDCR Secretary	Chancellor	Systemwide policy and institutional agreements
Regional / Division Leadership	Deputy Chancellor / Associate Vice Chancellor	Multi-site operational coordination
Warden	District executive leadership	Facility-level institutional coordination
Associate Warden / Captain	College administration / PREP administration	Operational implementation
Educational Supervisor / Facility Education Staff	PREP Administrator / Program Chair	Day-to-day instructional coordination

The committee recognizes that many operational issues are resolved successfully through local cooperation and that PREP faculty and administrators work extensively to support instruction within highly complex environments.

At the same time, the scale and complexity of PREP increasingly resemble a districtwide strategic initiative rather than a localized instructional program.

As PREP continues to expand, the District may benefit from considering whether primary administrative oversight should return to a district-level structure better positioned to coordinate:

- cross-college participation,
- CDCR partnerships,
- student transition pathways,
- counseling integration,
- and long-term institutional planning.

The committee believes this could potentially include assignment of a district-level administrator with formally designated PREP oversight responsibilities and substantial reassigned workload dedicated

to:

- interagency coordination,
- institutional planning,
- pathway development,
- and cross-campus program integration.

The committee is not recommending a specific organizational model. However, discussion suggested that PREP's current operational scale may warrant coordination at a level above traditional single-college administrative structures.

B. Operational Stability and Program Continuity

Discussion

PREP now operates at a scale requiring durable institutional infrastructure rather than primarily informal or ad hoc coordination mechanisms.

The PREP MOU reflects this increasing complexity through provisions involving:

- Program Chair structures,
- operational communication,
- administrator presence,
- safety procedures,
- faculty coordination,
- and institutional accountability.

As the program continues to evolve, there appears to be growing need for:

- continuity planning,
- formalized operational structures,
- stable communication pathways,
- and sustained administrative support systems.

Committee discussion also emphasized the importance of relationship-building across institutions and campuses. Several participants suggested that PREP may benefit from a more formalized coordination role focused on:

- institutional communication,
- student transition continuity,
- partnership development,
- and cross-campus collaboration among PREP, counseling, and re-entry support programs.

C. Program Leadership and Coordination

Discussion

The PREP MOU established a Program Chair structure recognizing the unique coordination demands associated with prison education.

Current coordination responsibilities now appear to include:

- faculty communication,
- instructional continuity,
- operational coordination,
- professional development,
- student support communication,
- interagency collaboration,
- and cross-campus relationship development.

The committee believes these responsibilities increasingly resemble the operational needs of a multi-site institutional program rather than a limited supplemental instructional assignment.

As PREP continues to mature, the District may benefit from evaluating:

- long-term leadership structures,
- district-level coordination models,
- operational communication pathways,
- and institutional support systems appropriate to a growing districtwide educational initiative.

D. Future Program Sustainability

Discussion

The committee recognizes ongoing discussions regarding the future operation of PREP at specific facilities, including Mule Creek State Prison.

The committee does not take positions regarding collective bargaining matters or labor negotiations. However, operational instability may significantly affect:

- student continuity,
- educational planning,
- faculty participation,
- institutional relationships,
- and long-term program credibility.

The committee encourages continued collaborative efforts among:

- LRCCD,
- LRCFT,
- Academic Senate leadership,
- PREP faculty,
- counseling and re-entry personnel,
- and CDCR stakeholders

to strengthen the institutional alignment necessary to sustain a compliant and academically integrated prison education program.

IV. Conclusion

PREP has evolved into a substantial educational initiative serving justice-impacted students across multiple correctional facilities and instructional environments.

The review suggests that PREP has grown beyond the operational scale of a supplemental instructional program and now requires:

- durable institutional integration,
- sustained academic planning structures,
- coordinated governance participation,
- stable communication systems,
- cross-campus collaboration,
- and long-term institutional support.

Many foundational elements necessary for long-term sustainability remain partially developed or inconsistently integrated into existing district structures. At the same time, the program has established significant momentum and demonstrates substantial commitment from faculty, counselors, staff, and administrators working across challenging institutional environments. The committee respectfully recommends continued collaboration among:

- District leadership,
- Academic Senate leadership,
- PREP faculty,
- counseling and student services,
- LRCFT,
- re-entry support programs,
- and CDCR stakeholders

to support the continued development of a sustainable, academically integrated, and educationally effective prison education program within the Los Rios Community College District.